

## **Information Clause for Data Processing during Recruitment**

Pursuant to Article 13(1) and Article 13(2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ EU L 2016 no. 119, p. 1) (hereinafter “**GDPR**”), please be advised that:

### **1. Joint Controllers**

The Joint Controllers of your data are:

- a) Dom Development S.A., company registration (KRS): 0000031483, registered office in Warsaw, Pl. Piłsudskiego 3, 00-078 Warszawa (the “Executive Controller”),
- b) Dom Development Kredyty sp. z o.o., company registration (KRS): 0000698268, registered office in Warsaw, Pl. Piłsudskiego 3, 00-078 Warszawa,
- c) Dom Construction sp. z o.o., company registration (KRS): 00000726296, registered office in Warsaw, Pl. Piłsudskiego 3, 00-078 Warszawa,
- d) Dom Development Wrocław sp. z o.o., company registration (KRS): 0000609068, registered office in Wrocław, ul. Legnicka 16, 53-673 Wrocław,
- e) Dom Development Kraków sp. z o.o., company registration (KRS): 0000952695, registered office in Cracow, ul. Wadowicka 3a, 30-347 Kraków,

hereinafter the “Joint Controllers”.

### **2. Contact with Joint Controllers**

In any matters concerning the protection of personal data, you may contact both the Executive Controller and the Joint Controllers, however the Executive Controller is responsible for ensuring the exercise of your rights under the GDPR. Therefore, all correspondence should be directed to the Data Protection Officer, who serves as the designated point of contact for the Joint Controllers:

- a) by traditional post to the address of the Executive Controller’s registered office, or
- b) by email at: [iodo@domd.pl](mailto:iodo@domd.pl) ,

### **3. Scope of Personal Data**

The Joint Controllers jointly oversee the processing of your personal data. The Joint Controllers require the candidate to provide only the personal data prescribed by applicable law, namely: name(s), surname, parents' names, date of birth, residential address (postal address), education and employment history.

### **4. Data Source and Voluntary Data Provision**

Your personal data has been collected directly from you or through a recruitment agency in connection with the recruitment campaign for the vacancy we offer. If you apply to be engaged under a contract of employment, you are required by law, as prescribed in Article 221 of the Labour Code, to provide the personal data requested by the Controller. Failure to provide such data will render it impossible for your application to be processed in the recruitment campaign. The provision of personal data that is not required by law - it is voluntary. If you apply to be engaged as a contractor under a civil law contract, the provision by you of the personal data requested by the Controller is voluntary, but is required by the Controller for the purposes of the recruitment campaign. Failure to provide such data will render it impossible for your application to be processed in the recruitment campaign.

## **5. Purpose and Legal Basis of Data Processing**

Your personal data will be processed for the following purposes:

- a) taking action at the request of the data subject, prior to the conclusion of the contract (Article 6(1)(b) of the GDPR),
- b) conducting the recruitment campaign for the position for which you are applying - the legal basis for such processing is:
  - if you apply to be engaged under a contract of employment: a legal obligation under the law (Article 6(1)(c) of the GDPR in conjunction with Article 221 of the Labour Code), and the fact that the processing of your data is necessary for steps to be taken to enter into the contract (Article 6(1)(b) of the GDPR) and, as regards any optional data that is not required by law, the legal basis for the processing is your consent (Article 6(1)(a) of the GDPR), or
  - if you apply to be engaged as a contractor under a civil law contract: the processing of the data is necessary for steps to be taken to enter into the contract (Article 6(1)(b) of the GDPR) and, as regards any optional data provided by you, the legal basis for the processing is your consent (Article 6(1)(a) of the GDPR), or
  - respectively, in the scope of processing of special data categories, Article 6(1)(c) of the GDPR in conjunction with Article 9(2)(b) of the GDPR and Article 10 of the GDPR, and Article 6(1)(a) of the GDPR in conjunction with Article 9(1)(a) of the GDPR,
- c) future recruitment campaigns on the basis of your consent, if such consent has been given by you (Article 6(1)(a) of the GDPR), or
- d) the establishment, exercise or defence of claims (if any), which constitutes a legitimate interest of the Controller (Article 6(1)(f) of the GDPR), where such interests involve an opportunity to establish, exercise or defend claims (receivables).

## **6. Data Recipients**

Your personal data may be shared with entities that the Controller engages to perform tasks requiring data processing, such as email management, hosting, IT, administrative, legal, or advisory services. It may also be shared with providers of telecommunication, courier, insurance, billing, or accounting services, as well as any other parties to whom the Controller assigns tasks. Your personal data may also be shared with entities or authorities authorised to receive it - but only in justified cases and in accordance with applicable law.

## **7. Retention Period**

Your personal data will be processed until the current recruitment campaign is completed, and with regard to personal data that is processed on the basis of your consent to the processing for the purposes of future recruitment campaigns, your personal data will not be processed for a period longer than one year from the date of your consent. With regard to data that is processed for the purpose of the Controller's legitimate interests, such data may be retained for the purpose of the establishment, exercise or defence of claims, until the limitation period for such claims expires.

## **8. Your Rights**

With regard to the processing of personal data, you have the right to: access, rectify or erase your personal data, restrict its processing, and transfer your data. If your personal data is processed on the basis of legitimate interests, you have the right to object to the processing for reasons associated with your particular situation. You also have the right to object to the processing of your personal data for direct marketing purposes. To the extent to which you have given consent to the processing of your

personal data, you have the right to withdraw that consent at any time, without impacting on the legality of the processing of your personal data that has been done on the basis of your consent prior to its withdrawal. You have the right to file a complaint with the supervisory authority competent for personal data protection (President of the Personal Data Protection Office).

### **9. Key Arrangements of the Joint Controllers**

The key arrangements defining the split of obligations resulting from the joint processing of personal data between the Joint Controllers, including the exercise of rights against data subjects, is available at the link <https://domd.pl/getmedia/957cd50a-45f0-4e2a-b223-0abe424bie2/Uzgodnienia-Wspoladministratorow-2024.pdf>, the registered office of the Executive Controller and from the Data Protection Officer.

### **10. Consent for Future Recruitment**

By providing your personal data beyond the scope required by a Joint Controller, you consent to the processing of such additional personal data for the purposes of the ongoing recruitment campaign. You have the right to withdraw your consent to the processing of your personal data at any time. The withdrawal of your consent to the processing does not affect the lawfulness of any data processing based on your consent prior to its withdrawal. If you agree to the processing of your personal data for future recruitment campaigns, please include the following statements in your application documents:

*I consent to the processing by Dom Development S.A., Dom Development Kredyty Sp. z o.o., Dom Construction Sp. z o.o., Dom Development Wrocław Sp. z o.o. and Dom Development Kraków Sp. z o.o. of the personal data contained in my application for the purposes of future recruitment campaigns. I have been advised that I have right to withdraw my consent to the processing of my personal data at any time. The withdrawal of my consent to the processing of my personal data shall not affect the lawfulness of any data processing based on my consent prior to its withdrawal.*

The granting of this consent is entirely voluntary, and does not affect the recruitment campaign conducted by Joint Controllers.