

GDPR Information Clause

Pursuant to Article 13(1) and (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, “GDPR”), I hereby inform you that:

1. Data Controller

The controller of your personal data is NAJ International Sp. z o.o., Rondo ONZ 1, 00-124 Warsaw, Poland, Tax Identification Number (NIP): 5210090012 (the “Controller”).

2. Purpose and Legal Basis of Processing

Your personal data will be processed for the purpose of conducting recruitment processes carried out by the Controller for positions offered by the Controller’s clients, as well as for presenting anonymised candidate profiles to potential employers. Your data may also be processed for the purpose of securing and, if necessary, establishing, pursuing or defending against claims related to the recruitment process.

The legal basis for the processing of your personal data is Article 6(1)(a) of the GDPR, i.e. your freely given, specific, informed and unambiguous consent expressed by submitting your application to participate in a recruitment process conducted by the Controller. Providing personal data is voluntary; however, it is necessary in order to participate in the recruitment process conducted by the Controller.

3. Confidential (Hidden) Recruitment Process

The Controller conducts recruitment processes in the form of so-called confidential (hidden) recruitment, in which, at the initial stage, the identity of the potential employer is not disclosed. Information about candidates is shared with the potential employer in anonymised form, preventing both direct and indirect identification of candidates.

Personal data enabling your identification will not be disclosed to a potential employer without your separate and explicit consent. If a potential employer expresses interest in your profile, you will be informed of the employer’s identity and asked to provide separate consent to disclose your personal data. Upon granting such consent, the potential employer will become an independent controller of your personal data and will fulfil its information obligations towards you in accordance with Article 14 of the GDPR.

4. Future Recruitment and Marketing Purposes

If you provide separate voluntary consent in the application form, your personal data may also be processed:

- for the purposes of future recruitment processes;
- for marketing purposes (legal basis: Article 6(1)(a) GDPR).

5. Recipients of Personal Data

Recipients of your personal data will be entities with whom the Controller has concluded recruitment agreements, solely upon obtaining your written consent.

Your personal data may also be processed by entities providing the Controller with IT system support, recruitment tools, and legal services, exclusively on the basis of appropriate data processing agreements and in compliance with applicable data protection laws.

Your personal data will not be transferred to third countries outside the European Economic Area unless you are informed separately thereof.

6. Data Retention Period

Your personal data will be retained until the completion of the specific recruitment process or until you withdraw your consent. After completion of the recruitment process, your data will be retained for the period resulting from your consent to participate in future recruitment processes or, irrespective of the withdrawal of consent, for the period necessary to establish, pursue or defend against potential claims related to participation in the recruitment process, but no longer than until the expiry of the applicable statutory limitation periods under generally binding law.

7. Your Rights

You have the right to access your personal data and to request rectification, erasure, restriction of processing, and data portability, as well as the right to object to processing and the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

8. Right to Lodge a Complaint

You have the right to lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych) if you believe that the processing of your personal data violates data protection laws.

9. Voluntary Participation and Withdrawal of Consent

Participation in the recruitment process and provision of personal data are voluntary and equivalent to granting consent for their processing. Such consent may be withdrawn at any time. In the event of withdrawal, the personal data will be deleted without undue delay. Withdrawal of consent should be sent to: out@naj.com.pl.

10. Updating Personal Data

Changes to personal data may be made by submitting a relevant request to: RODO@naj.com.pl. In response, you will receive an activation link enabling you to update your personal data in the Controller's system.