

# Privacy Policy

## 1. Definitions

1. **Personal Data Controller** – Axell Group entities in Poland (Axell Financial Services Sp. z o.o. with its registered office in Skierniewice at ul. Rybickiego 41; Axell Logistics Sp. z o.o. with its registered office in Rakoniewice at ul. Grodziska 50).
2. **Personal data** – all information about a natural person identified or identifiable by one or more specific factors determining the physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, location data, internet identifier and information collected using cookies and other similar technology.
3. **Policy** – this Privacy Policy.
4. **GDPR** – 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.
5. **Website** – a web portal run by the Personal Data Controller at <https://axell-group.com>
6. **User** – any natural person visiting the Website or using one or more services or functionalities described in the Policy.

## 2. Data processing in connection with the use of the website

1. In connection with the User's use of the Website, the Personal Data Controller shall collect the data necessary for commercial contact and recruitment process as well as information about the User's activity on the Website using cookies. The detailed rules and purposes of the processing of personal data collected while using the Website by the User are described below.

## 3. General data protection principles

1. The Personal Data Controller undertakes to comply with applicable provisions of the law and data protection principles, such as the GDPR, which means that your data shall be:
  1. used lawfully, fairly and in a transparent manner. Collected only for valid purposes that have been clearly explained and not used in any way that is inconsistent with those purposes;
  2. appropriate for the purposes about which you have been informed and only necessary to achieve those purposes;
  3. accurate and up to date;
  4. kept only for as long as necessary for the purposes about which you have been informed;
  5. properly secured.

## 4. Purposes and legal grounds for the processing of data on the Website

### 4.1. Use of the Website

1. Personal data of all persons using the Website (including IP address or other identifiers and information collected using cookies or other similar technologies) are processed by the Personal Data Controller:
  1. in order to provide services by electronic means in the scope of making the content collected on the Website available to Users, sharing contact forms - then

the lawful basis for data processing is the necessity of data processing to perform the contract (Article 6 (1) (b) of the GDPR);

2. for marketing purposes of the Personal Data Controller and other entities, in particular related to the presentation of online behavioural advertising - the rules for the processing of personal data for marketing purposes are described in section "MARKETING".
3. For the purpose of recruiting for specific job positions available at the Personal Data Controller's premises - then the lawful basis for data processing is your voluntary consent (Article 6 (1) (a) of the GDPR), including possible consent to further data processing in connection with recruitment for other job positions at the Personal Data Controller's premises. The rules for the processing of personal data for recruitment purposes are described in section "RECRUITMENT".

#### **4.2. Contact forms**

1. The Personal Data Controller shall provide the possibility of contacting it using electronic contact forms. In order to use the form, the User must provide personal data necessary to contact him/her and fill in the "Message" box. The User may also provide other data to facilitate contact or handling the inquiry. The data marked "Required" must be provided obligatorily in order to receive and handle the inquiry, and failure to do so results in the inability to handle the inquiry. Providing other data is voluntary.
2. Personal data is processed:
  1. in order to identify the sender and handle his/her inquiry sent using the provided form - the lawful basis for data processing is the necessity of data processing to perform the service contract (Article 6 (1) (b) of the GDPR);

#### **5. Marketing**

1. The Personal Data Controller shall process the Users' personal data in order to carry out marketing activities, which may include:
  1. sending e-mail notifications about interesting offers or content, which in some cases contain commercial information;
  2. conducting other types of activities related to direct marketing of services (sending commercial information by electronic means and telemarketing activities).
2. In order to carry out marketing activities, the Personal Data Controller uses profiling in some cases. This means that thanks to automatic data processing, the Personal Data Controller evaluates selected factors relating to natural persons in order to analyse their behaviour or create a forecast.

#### **6. Direct marketing**

1. If the User has consented to receive marketing information via e-mail, SMS and other means of electronic communication, the User's personal data shall be processed for the purpose of sending such information. The basis for data processing is the Personal Data Controller's legitimate interest in sending marketing information within the limits of the consent granted by the User (direct marketing). The User has the right to object to the processing of data for the purposes of direct marketing, including profiling. The data shall be stored for this purpose for the duration of the Personal Data Controller's legitimate interest, unless the User objects to receiving marketing information. The rules for exercising the right of withdrawal / objection are set out in section 11.

## 7. Social media

1. The Personal Data Controller shall process the personal data of the Users who visit the Personal Data Controller's profiles in social media (Facebook, LinkedIn). This data is processed only in connection with keeping the profile, including to inform Users about the Personal Data Controller's activity and to promote various types of events, services and products, as well as to communicate with users through the functionalities available on social media. The legal basis for the processing of personal data for this purpose by the Personal Data Controller is its legitimate interest (Article 6 (1) (f) of the GDPR) consisting in promoting its own brand and building and maintaining a brand-related community.

## 8. Recruitment

### 8.1. Types of processed data

1. In connection with the job application provided to us by you, we collect, store and use the following categories of your personal data:
  1. Information provided to us in your CV, cover letter or portfolio.
  2. Information provided to us in our application form, including your first name and surname, title, address, telephone number, private e-mail address, **employment record\* and qualifications\*** (\*if listed as required to be verified in a job advert).
2. The legal basis for the processing of this personal data is Article 6 (1) (f) of the GDPR, which relates to the processing of personal data necessary to pursue legitimate interests, namely for recruitment purposes. We may also collect, store and use the following special categories of personal data:
  1. Information if you are a person with disabilities so that we can consider if we need to make appropriate modifications during the recruitment process, for example, if any facilities for the disabled should be provided during a test or job interview.
  2. We do not expect to process information on judgements of conviction, unless the job position requires such information (certificate of clean criminal record).
3. The legal basis for the processing of personal data of special categories is Article 9 (2) (b) of the GDPR, which relates to our obligations in the field of employment and the protection of your fundamental rights.

### 8.2. Sources of personal data for processing in the recruitment process

1. Personal data of candidates for a job position are collected from the following sources:
  1. from candidates through the eRecruiter platform application, the application form on our Website or via e-mail;
  2. from Recruitment Agencies cooperating with the Personal Data Controller, to which you have provided your personal data and which have presented you as a candidate to the Personal Data Controller;
  3. from people who can confirm your employment record and the job positions you have held;
  4. From publicly available sources, such as a profile on LinkedIn or websites of personal consultancy entities, to which you, as a candidate, have provided your personal data so that it can be transferred to us.

### **8.3. The method of processing personal data at the recruitment stage**

1. The Personal Data Controller shall use the personal data collected to:
  1. assess your skills, qualifications and predispositions for the proposed job position;
  2. check basic information and references, if applicable;
  3. manage job applications and, in particular, document the recruitment processes;
  4. communicate with you on the course of the recruitment process;
  5. ensure compliance with legal requirements or requirements of regulatory authorities;
  6. communicate with managers conducting employment processes and job interviews;
  7. contact you (with your prior consent for further processing of you personal data) about future job positions.
2. After receiving your job application, CV, portfolio or cover letter, the Personal Data Controller shall review the information contained therein to decide whether you meet the basic requirements to be included in the list of candidates for the job position. If you are in this list, the Personal Data Controller shall decide if your job application meets the requirements for inviting you to a job interview. If the Personal Data Controller decides to invite you to a job interview, the information provided during the job interview shall be used to decide whether to offer you this job position. If the decision is made, the Personal Data Controller reserves the right to verify the references presented before the final approval
3. The Personal Data Controller shall process your personal data in order to decide on the conclusion of an employment contract or service contract with you.

### **8.4. Obligation to provide data**

1. Failure to provide the data that you are asked for results in the inability to process personal data, and as a result, the failure to achieve the goal of qualifying for a recruitment process for a specific job position.

## **9. Cookies and similar technology**

### **9.1. "Service" cookies**

1. The Personal Data Controller shall use the so-called service cookies primarily to provide the User with electronically provided services and to improve the quality of these services. Therefore, the Personal Data Controller and other entities providing analytical and statistical services to the Personal Data Controller shall use cookies by storing information or accessing information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). Cookies used for this purpose include:
  1. user input cookies with data entered by the User (session id) for the duration of the session;
  2. authentication cookies used for services requiring authentication for the duration of the session;
  3. user centric security cookies used to ensure security, e.g. used to detect fraud in the field of authentication;
  4. multimedia player session cookies for multimedia players (e.g. flash player cookies), for the duration of the session;

5. user interface customization cookies - permanent cookies used to personalize the User interface for the duration of the session or a little longer,
6. cookies used to monitor traffic on the website, i.e. data analytics, including Google Analytics cookies (these are files used by Google to analyse how the User uses the Website, to create statistics and reports on the operation of the Website). Google does not use the collected data to identify the User or link this information to enable identification. Detailed information about the scope and principles of data collection in connection with this service can be found at: <https://www.google.com/intl/pl/policies/privacy/partners>.

## **9.2. "Marketing" cookies**

1. The Personal Data Controller shall also use cookies for marketing purposes, including in connection with the targeting of behavioural advertising to Users For this purpose, the Personal Data Controller shall store information or access information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). The use of cookies and personal data collected through them for marketing purposes, in particular as regards the promotion of services and goods of third parties, requires the User's consent. This consent may be expressed through the appropriate configuration of the browser, and may also be withdrawn at any time, in particular by clearing the cookie history and disabling cookies in the browser settings.

## **10. Period of personal data processing**

1. The period of personal data processing by the Personal Data Controller depends on the type of service provided and the purpose of the processing. As a rule, the data shall be processed for the duration of the service or the performance of the order, until the consent is withdrawn or an effective objection to data processing is raised in cases where the legal basis for data processing is the Personal Data Controller's legitimate interest.
2. The data processing period may be extended if the processing is necessary to establish and assert any claims or defend against them, and after that time only if and to the extent required by provisions of the law. After the expiry of the processing period, the data is irreversibly deleted or anonymized.

## **11. User rights**

Data subjects have the following rights:

### **11.1 The right to information about the processing of personal data**

Based on that, the Personal Data Controller shall provide the person submitting the request with information on the processing of personal data, including, in particular, the purposes and legal grounds for the processing, the scope of the data held, entities to which personal data is disclosed and the planned date of data removal;

### **11.2 The right to obtain a copy of the data**

Based on that, the Personal Data Controller shall provide a copy of the processed data relating to the person submitting the request;

### **11.3 The right to rectification of personal data**

Based on that, the Personal Data Controller shall remove any inconsistencies or errors in the personal data being processed, and supplement or update the data if it is incomplete or has changed;

#### **11.4 The right to erase personal data**

Based on that, you may request the erasure of personal data, the processing of which is no longer necessary to achieve any of the purposes for which the data has been collected;

#### **11.5 The right to the restriction of the processing of personal data**

Based on that, the Personal Data Controller shall cease to carry out operations on personal data, with the exception of operations for which the data subject has consented, and the data storage, in accordance with the adopted retention rules, or until the reasons for the restriction of data processing cease to exist (e.g. a decision of the supervisory authority allowing further data processing is issued);

#### **11.6. The right to data portability**

Based on that, to the extent that the data is processed in connection with the contract concluded or consent given, the Personal Data Controller shall issue the data provided by the data subject in a computer-readable format. It is also possible to request that this data be sent to another entity, provided that there are technical possibilities in this regard, both on the part of the Personal Data Controller and another entity;

#### **11.7. The right to object to the processing of personal data for marketing purposes**

The data subject may at any time object to the processing of personal data for marketing purposes, without the need to justify such objection;

#### **11.8. The right to object to other purposes of data processing**

The data subject may at any time object to the processing of personal data based on the Personal Data Controller's legitimate interest (e.g. for analytical or statistical purposes or for reasons related to the protection of property). The objection in this respect shall contain a justification and be subject to the Personal Data Controller's assessment;

#### **11.9. The right to withdraw consent**

If the data is processed on the basis of consent, the data subject has the right to withdraw the consent at any time, which does not affect the lawfulness of the processing carried out before withdrawing the consent;

#### **11.10 The right to lodge a complaint**

If it is found that the processing of personal data violates the provisions of the GDPR or other provisions on the protection of personal data, the data subject may lodge a complaint with the President of the Personal Data Protection Office.

#### **11.11. An application regarding the exercise of the data subject rights may be submitted:**

1. by e-mail to the following address: [rodo.logistics@axell.pl](mailto:rodo.logistics@axell.pl) or [rodo.afs@axell.pl](mailto:rodo.afs@axell.pl)

2. and should include the following information:
  1. the right the applicant wants to exercise (e.g. the right to receive a copy of the data, the right to erase the data, etc.);
  2. the process the request concerns (e.g. the use of a specific service, activity on a specific website, receiving a newsletter containing commercial information to a specific e-mail address, etc.);
  3. the purposes the request concerns (e.g. marketing purposes, analytical purposes, etc.).
3. If the Personal Data Controller is unable to determine the content of the request or identify the applicant based on the submitted application, it shall ask the applicant for additional information.
4. The reply to the application shall be given within one month of its receipt. If it is necessary to extend this period, the Personal Data Controller shall inform the applicant about the reasons for such extension.
5. The answer shall be given to the e-mail address from which the application was sent.
6. The exercise of the above-mentioned rights may be limited by other provisions of the law. The right to object may be excluded if the Personal Data Controller proves that there are:
  1. valid legitimate grounds for the processing of personal data which are deemed by law to override your interests, rights and freedoms, or
  2. when the data is necessary to establish, assert or defend claims.

## **12. Recipients of personal data**

1. In connection with the provision of services, personal data is disclosed to external entities, including, in particular, suppliers responsible for the operation of IT systems, entities such as legal entities and other related entities under a data processing agreement, acting at the request of the Personal Data Controller.
2. The recipients of your personal data are also the Personal Data Controller's employees authorized to process the data.
3. The Personal Data Controller reserves the right to disclose selected information about the User to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with applicable laws.

## **13. Transfer of personal data outside the EEA**

1. The Personal Data Controller shall not transfer the collected data outside the European Economic Area.

## **14. Personal data security**

1. The Personal Data Controller shall conduct a risk analysis on an ongoing basis to ensure that it processes personal data in a safe manner ensuring, above all, that only authorized persons have access to the data and only to the extent necessary for the performance of their tasks. The Personal Data Controller shall make sure that all operations on personal data are recorded and performed only by authorized employees and associates.
2. The Personal Data Controller shall take all necessary steps to ensure that its subcontractors and other cooperating entities guarantee the application of appropriate security measures in each case when they process personal data at the request of the Personal Data Controller.

## 15. Contact data

1. Contact data of the persons responsible for the processing of personal data in Axell Group entities in Poland:
  1. **Axell Financial Sp. z o.o.**  
Katarzyna Żaloba  
e-mail: [rodo.afs@axell.pl](mailto:rodo.afs@axell.pl)  
or phone: +48 735 206 729
  2. **Axell Logistics Sp. z o.o.**  
e-mail: [rodo.logistics@axell.pl](mailto:rodo.logistics@axell.pl)  
or phone: +48 61 443 69 23

## 16. Changes to the Privacy Policy

1. The Personal Data Controller undertakes to verify the Policy on an ongoing basis and update it if necessary.

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