

PRIVACY NOTICE FOR JOB APPLICANTS

I. Introduction

The personal data of all individuals who apply to work with us is protected and will always be used in accordance with the law.

In accordance with Articles 13(1) and (2) and 14 of the Regulation 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 (hereinafter: "GDPR"), we inform you that:

The data controller of your personal data is the respective company of the GroupM Group (hereinafter: 'Group' or 'GroupM Group') named in the job offer. The exact addresses of the individual GroupM Group companies can be found at the end of this document.

If you consent to the processing of your personal data for future recruitment purposes, GroupM sp. z o.o. will be the controller of your personal data.

If you have any questions, comments or concerns about any aspect of this policy or our handling of applicant data, please email us at rodo@groupm.com or write to the Controller.

This privacy notice describes how we collect, use and process your personal data in connection with the recruitment process and informs you of your rights under the GDPR. It applies to the personal data we collect through public sources (e.g. LinkedIn), as well as CVs and other documents you send to us, or when you participate in a recruitment process organised by a recruitment agency or headhunter.

II. What information do we collect and how do we obtain it?

We collect personal information from candidates in a number of ways: candidates may provide the information themselves, or we may collect it in other ways. In this section we explain the different ways in which we collect personal information and some of the ways in which we use it.

We collect personal information that you provide to us when you contact or interact with us through our website, by email, telephone or otherwise. For example, you may provide us with information when you contact us about a job opportunity at GroupM by submitting your resume or other career information.

If you are part of a recruitment process organised by a recruitment agency or headhunter, we will receive information from them: Your name, address, email address, postal address, contact number, information about your education, professional qualifications or previous employment history, and any other personally identifiable information you provide as part of your interaction with GroupM.

If one of our current employees has recommended you for a job with us, we will have received your contact information from that person.

If you have agreed to participate in future recruitment processes, GroupM sp. z o.o. may be the source of your personal data in the event that it is transferred to another GroupM company that may be interested in your profile as part of another recruitment process.

III. For what purposes do we process data?

We will process various information about you for the following purposes and on the following legal bases:

- 1. to carry out the recruitment process for the position specified in the job advertisement or presented by a recruitment agency or headhunter::**
 - in order to comply with our legal obligations - the data specified in the Labour Code (e.g. identification data, contact details, education, work experience, skills, qualifications);
 - in order to act upon your request prior to the conclusion of the contract (e.g. information about your expected salary and salary expectations and availability, information about recruitment interviews and our assessment of your application);
 - on the basis of our legitimate interest (e.g. the results of your competency tests, information collected from professional and business portals such as LinkedIn, data necessary for the execution and settlement of the cooperation with a recruitment agency or headhunter);
 - on the basis of your consent (e.g. data that you voluntarily include in your job application, e.g. your image, interests, data included in references from former employers that you voluntarily provide); and employers that you voluntarily provide to us);
 - to comply with our legal obligations and exercise your specific rights (e.g. sensitive data relating to your disability in connection with the Vocational and Social Rehabilitation and Employment of Disabled Persons Act);;
- 2. to monitor your satisfaction with the recruitment process (based on our legitimate interest);**
- 3. to establish, assert or defend against claims relating to the recruitment process (on the basis of our legitimate interest);**
- 4. in the event that we need to repeat the recruitment process (based on our legitimate interest).**

As a general rule, we ask that you do not provide us with sensitive data during the recruitment process, such as information about your health or other data referred to in Article 9 of the GDPR. However, if you consider it necessary to provide such data during the recruitment process, e.g. due to your particular situation, we will ask you to give your separate consent for us to process such sensitive data.

The provision of personal data specified in the Labour Code or other legislation (if specified above) is mandatory in order to participate in the recruitment process. Similarly, the provision of the data indicated above is necessary in order to carry out actions at your request prior to the conclusion of a contract and necessary for our legitimate interests. The provision of other data is optional.

In addition, if you are interested in participating in future recruitment processes conducted by our GroupM Group and you provide the relevant consent, your personal data will be processed by GroupM sp. z o.o. for future recruitment within our Group. In the event that one of the companies in the GroupM Group is looking for a candidate with a profile similar to yours, GroupM sp. z o.o. will share your personal data with that company, taking into account the legitimate interest of our Group in being able to conduct effective recruitment processes. Such sharing will be limited to the specific recruitment process and the company receiving your data will notify you immediately.

IV. Who may we share your personal information with?

We may share your personal data with providers of job posting services, providers of recruitment management systems, providers of IT services such as hosting and providers of IT systems. In addition, your data may be transferred to companies within our GroupM and WPP group of companies - within these companies, data is transferred for internal administrative purposes.

In the course of processing, data may be transferred to entities located in countries outside the EU, including the United Kingdom and the United States of America. In such cases, data will be transferred after appropriate safeguards have been put in place, in particular on the basis of

- Commission Decision (EU) 2021/1772, issued pursuant to Regulation (EU) 2016/679[2] of the European Parliament and of the Council, finding that the United Kingdom provides an adequate level of protection for personal data - in situations where your data is transferred to the United Kingdom;

- the standard data protection clauses adopted by the European Commission, and provided that enforceable data subject rights and effective data subject remedies are available in the country to which the data is transferred - in situations where your data is transferred to the United States of America.

V. How long do we process your personal data?

We will process your personal data for the purpose of recruiting for the position specified in the advertisement for a period of

- 12 months - in the case of applicants for employment on the basis of an employment contract;
- as required by applicable law (other than the Labour Code or justified by the interests of the controller, provided that the rights and freedoms of the applicant are not violated) - in the case of applicants for employment on the basis of an employment contract; and
- in the case of applicants for employment on the basis of a civil law contract;
or
- until you withdraw your consent, if you have given your consent to participate in future recruitment processes, but in any case for no longer than 12 months.

VI. Your rights under the GDPR policy

You have a number of rights in relation to the processing of your personal data. Below you will find general information about these rights and instructions on how to exercise them.

You may submit a request to exercise your rights in writing to the correspondence address of the data controller or by e-mail to rodo@groupm.com. We will respond to your request promptly and within one month of receiving it. Within the same period, we will take any action that we consider appropriate. In special cases, the period within which we take this action may be extended to 3 months.

You have the right to be informed whether and to what extent we process your personal data. Upon request, we will provide you with information in writing or electronically (at your option) about the scope and purposes of the processing of your personal data, the categories of data processed, the duration of the processing, the entities to which we have disclosed or transferred your personal data for processing (data recipients), as well as information about the sources from which we have obtained data about you.

If the processing involves automated decision making about your situation, you will also be provided with information about the rules for making such decisions, their significance and the likely consequences.

As part of this right, you may also request a copy of your personal data, although only the first copy will be provided free of charge. A charge will be made for the second and subsequent copies.

You have the right to rectify personal data that is inaccurate and to update or complete the data if the data or your situation has changed.

You also have the right to request the deletion of data processed by the Controller about you or to restrict the processing where the conditions set out in the law apply.

You also have the right to ask for your personal data to be transferred to another controller or to be made available to you in an electronic format.

You also have the right to request that your personal data be transferred to another controller or provided to you in a structured, commonly used machine-readable format, but this right is limited to the personal data that the Controller has received from you.

You also have the right to object to processing on the basis of our legitimate interest. The objection must be justified, as its legitimacy is subject to our assessment.

You may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of any processing carried out on the basis of the consent prior to its withdrawal.

If you believe that our processing of your personal data may infringe your rights, please let us know. Privacy is an important area of our business and we welcome any comments or suggestions in this regard. Notwithstanding the foregoing, you may lodge a complaint about the Controller's processing of your personal data with the President of the Data Protection Authority. You may contact the Authority at the following address 2 Stawki Street, 00-193 Warsaw. Further information can be found at: <https://uodo.gov.pl/pl/p/kontakt>.

VII. Contact details

You can contact us about any data protection matter at rodo@groupm.com.

We have appointed a Data Protection Officer who is a dedicated person for data protection matters. The Data Protection Officer can be contacted at iod@groupm.com.

Below you will find the exact address details of the GroupM Group companies:

- GroupM sp. z o.o., pl. Konesera 11, 03-736 Warszawa
- EssenceMediacom Poland sp. z o.o., pl. Konesera 11, 03-736 Warszawa
- Wavemaker sp. z o.o., pl. Konesera 11, 03-736 Warszawa
- Mindshare Polska sp. z o.o., pl. Konesera 11, 03-736 Warszawa
- The & Partnership Limited sp. z o.o., pl. Konesera 11, 03-736 Warszawa

GroupM is part of the WPP Group. The WPP Group's personal data processing rules for recruitment can be found here: <https://www.groupm.com/groupm-privacy-notice-for-recruitment/>.