

## Privacy policy

### Introduction

The protection of personal data is extremely important to us and is taken very seriously by us. Therefore, we have prepared below a set of information describing the legal basis for the processing, collection and use of personal data.

This Policy also describes information on the rights of individuals.

This Policy also applies if you contact us or we contact you regarding our Services.

Our website does not serve to obtain or process personal data, let alone special categories of personal data (sensitive data). For more on this, please see the section "Purpose of processing personal data" under the subsection "Visitors to our website".

### Legal basis

The legal basis for this privacy policy is 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 (hereinafter referred to as the GDPR).

### Personal data administrator

The administrator of personal data within the meaning of GDPR is STARS Sp. z o.o., ul. Romera 10 lok. B3, 02-784 Warsaw, KRS0000244849, REGON 140333629, NIP 9512165789. Should you have any questions concerning this document and the manner and purposes of our personal data processing, please contact us at: STARS Sp. z o.o., ul. Romera 10 lok. B3, 02-784 Warsaw. E-mail address: stars@stars.com.pl Tel: +48 22 418 66 90

### Purpose of personal data processing

In order to carry out our normal work we need to stay in contact with the outside world. For example, we contact our customers, suppliers, job applicants, etc. Each time we come into contact with an individual whose personal data we must and want to protect.

Our business activities deal with personal data in the following cases:

*Business contacts* - these are contacts with individuals representing primarily our clients, potential clients, but also other recipients of our work and opinions (e.g. journalists). This is the primary case of our use of personal data, most often in the form of email correspondence. The legal basis in this case is the processing necessary for the performance of the contract and our legitimate interest.

*Employees and associates* - a special group of people who provide us not only with basic personal data, but also with special data. Access to and processing of such data is treated particularly strictly. The legal basis in this case is Art. 6.1.b and Art. 6.1.c GDPR.

*Candidates in the recruitment process* - these are contacts with individuals who have applied to go through the recruitment process at our company, or who have been invited into the process by us. We place particular emphasis on protecting information contained in CVs or documents revealing motivation to change jobs (letters of application, letters of intent). We process candidates' data only for a specific recruitment process, unless the candidate

expressly agrees to its use for other processes and it is then deleted irretrievably. The legal basis in this case is the consent of such a person and our legitimate interest.

*Suppliers* - these are other contacts with individuals representing other companies or themselves providing us with services, goods and information. The legal basis in this case is the processing necessary for the performance of the contract and our legitimate interest.

*Visitors to our office* - persons visiting our office whose personal details are known to us from previous correspondence. Out of concern for the protection of the personal data of such persons, we do not verify their identity using, for example, identity documents, but only on the basis of their voluntary verbal presentation. The legal basis in this case is the consent of such a person and our legitimate interest.

*Other contact persons* - these are persons who themselves contact our company for various purposes, usually by email. The legal basis in this case is the processing necessary for the performance of the contract and our legitimate interest.

*Visitors to our website* - visitors to our website, where we only record the fact of their visit, duration of the session, pages visited, and the only information we collect is the cookie of the device the visitor is using, which serves to provide us with very general information about the visitor's general geographic origin (e.g. country, city) and general aggregate statistics (e.g. repeat visit, average visit time, etc.). So, we do not collect personal data here in the light of the GDPR.

In none of the above cases do we collect and process personal data on a mass scale, do we make automatic decisions on the basis of the collected data, do we match and thus combine data sets into new sets to facilitate our automatic use of personal data.

### **Our legitimate interest in using your personal data**

Where we have indicated above that our use of personal data is based on our "legitimate interest", this interest means:

meeting the needs of our customers, including the provision of our products and services;  
marketing our products and services without promotional activities aimed at specific individuals and, if so, only with their consent;  
managing complaints and resolving any disputes;  
protecting and supporting our business, employees, customers and shareholders;  
preventing and detecting fraud and other crimes;  
testing and developing new products and services and improving existing ones.

### **Sources of personal data**

The personal data that we already hold or that we will hold usually comes from three sources: it has been provided to us in the course of business email correspondence from the person himself (e.g. in the so-called footer of an email) or from a colleague of his, it has been provided to us in the form of a visiting card by the person himself, it has been taken from official sources (e.g. website with contact details, paper publications, public KRS data, social networks such as LinkedIn, for example, etc.). In this case, we will comply with the information obligation under the GDPR.

We do not purchase databases of personal data.

### **Transfer of personal data that we hold**

We do not pass on personal data to third parties or anyone else, except in the following situations:

*To an accounting and HR company*, the personal data of our contractors which are on financial and accounting documents (e.g. invoices, accounting notes, order documents, etc.) for the purposes of accurate accounting, monitoring of receivables and payables and for debt collection, as well as the personal data of our employees and associates and job applicants for the purposes of personnel policy, insurance, recruitment and order processing.

*To the hosting company* in charge of our mail servers, for the purpose of storing correspondence sent, received or drafts, or for the purpose of backing up company correspondence we have with external parties.

*To courier companies or intermediaries/integrators* of such services dealing with the posting and delivery of company mail, in order to be able to perform mail delivery to these individuals.

*To companies that are our direct business partners*, with whom we work together on behalf of clients to perform a service for them.

In all the aforementioned cases, always based on a personal data processing agreement in which we are the Controller of the personal data and the receiving party is the processor in accordance with the GDPR.

In addition, personal data may be transferred to entities entitled to receive such data under applicable law, including relevant judicial authorities.

### **Period of retention of personal data**

We will retain personal data for the duration of our relationship with the individual and after the termination of the relationship if there is a risk of redress in relation to the existence of the relationship, but for no longer than 10 years from the date of termination. The length of time for which personal data is stored may also be different if this is required by separate legislation (e.g. employment law).

### **Protection of the personal data we hold**

We have implemented a security framework and standards, procedures and training covering data protection, confidentiality and security and regularly review the measures in place to ensure they are adequate to secure the data we hold.

We use physical and programmatic safeguards to protect personal data against unauthorised access and other disclosure or loss and against destruction or unauthorised modification of data.

We use appropriate technical and organisational measures at an equal level of security as our corporate data to ensure the protection of the personal data processed, including safeguards of a technical and programmatic nature, in particular data encryption systems.

## **Rights of individuals and how to exercise them**

Individuals have clarified rights regarding their personal data and controllers of personal data are responsible for the exercise of these rights.

Where we are the Data Controller of the personal data, we provide information below about the rights of individuals and the ways in which they can be exercised:

### *Being informed and being forgotten*

Individuals have the right to be informed that we are processing their personal data. They also have the right to be forgotten.

### *Access to personal data*

Individuals have the right to access their data that we hold as data controller. This right can be exercised by contacting us at: [GDPR@stars.eu](mailto:GDPR@stars.eu)

### *Updating, supplementing and rectifying personal data*

Individuals can update, supplement and rectify the personal data they have provided to us by sending an email to [GDPR@stars.eu](mailto:GDPR@stars.eu) or where appropriate we will correct it based on updated information e.g. from email correspondence.

### *Withdrawal of consent*

Individuals, even after giving us their consent, have the right to withdraw that consent at any time. To withdraw your consent to the processing of your personal data, please send us an email by sending an email to [GDPR@stars.eu](mailto:GDPR@stars.eu)

### *Right to restrict processing or object to the processing of personal data*

Individuals have the right to restrict processing or object to the processing of their personal data at any time, on the basis of their particular situation, unless such processing is required by law. In this case, we will no longer process the personal data or limit the processing to the absolute minimum, provided that we can demonstrate a legitimate ground for the processing or for the establishment, exercise or defence of our rights.

### *Right to lodge a complaint*

Individuals whose personal data we process if they wish to make a complaint about our use of their personal data can do so by sending an email to [stars@stars.eu](mailto:stars@stars.eu) together with details of the complaint. We will consider and respond to all complaints received.

In addition, individuals also have the right to lodge a complaint with the Supervisory Authority, i.e. the President of the UODO. For more information on individuals' rights and how to lodge a complaint with the Supervisory Authority, please visit [www.uodo.gov.pl](http://www.uodo.gov.pl) .

## **Cookies and their use**

Cookies are small text files that are installed on a device when a website is viewed, regardless of whether the website user is registered or logged in or not. Cookies usually contain the domain name of the originating website, the length of time they are stored on the end device and a unique number.

Cookies help to provide important features and functionality of our website in order to improve the quality of such person's use of the website. Cookies can help us to understand how our website is used, for example to inform us if error messages occur during use.

On your first visit, we ask you to accept (consent) to the use of a cookie. We collect data that is mostly aggregated and anonymised. We do not use cookies to market our services or pass them on to third parties. You can use your browser settings to accept or reject new cookies and delete existing cookies. You can also set your browser to notify you whenever new cookies are placed on your device. More detailed information on how to manage cookies can be found using the help function available in your browser.

### **Social network icons**

Social network icons allow visitors to share information about us or follow information we publish on social networks. They allow you to connect to third-party social media sites that may record information about your online activities, including your activities on our site. You should read these sites' terms of use and privacy settings to learn how the social networks use the information they obtain about you, and your options for opting out of the relevant cookies or deleting such data.

### **Amendments to this document**

We recognise that transparency in relation to data is an ongoing obligation, so we will regularly review and update this document.

This Policy was last updated on 12.02.2024.