

# **PROCESSING OF PERSONAL DATA FOR EMPLOYMENT PURPOSES**

In compliance with Article 13(1)–(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 ("GDPR"), we hereby inform you that:

Perlik Aluminium Sp. K., located at ul. Teofila Morawskiego 31, 63-460 Ociąż (Nowe Skalmierzyce) (hereinafter referred to as "the Company"), is the controller of personal data processed in connection with employment based on an employment contract.

### **Contact Information**

Perlik Aluminium Sp. K. ul. Teofila Morawskiego 31 63-460 Ociąż (Nowe Skalmierzyce) Email: info@perlik.eu Phone: +48 780 632 991



# **PROCESSING OF PERSONAL DATA FOR EMPLOYMENT PURPOSES**

Purpose of Processing	Legal Basis		
Conclusion and Performance of an Employment Contract or Another Agreement Under Which We Cooperate Depending on the type of contract, this includes, in particular: fulfilling obligations specified in the agreement, maintaining employee records, organizing the processing of personal data in the HR system, payroll administration and salary payments, managing employee benefits and entitlements, executing salary deductions, processing sick leaves and allowances, handling occupational health check-ups, issuing and dispatching employment certificates and tax documents (PIT), managing contract terminations and disciplinary measures, handling documentation, and conducting correspondence related to the contract or submitted requests.	Article 6(1)(b) GDPR (necessity for the performance of a contract) Article 6(1)(c) GDPR (legal obligation arising from labor law and other employment regulations)		
Other obligations imposed on the Company as an employer by legal regulations, such as the archiving of employee records and other documents related to employment, compliance with occupational health and safety requirements, including incidents occurring at work or on the way to/from work, settlement of income tax advances, payment of social security contributions, and measures to prevent workplace bullying or discrimination. Other obligations arising in cases where you exercise additional rights provided under labor law.	Article 6(1)(c) GDPR (legal obligation arising from labor law and other employment regulations, tax laws, and social security laws)		
Enhancing qualifications through various types of training, workshops, and e-learning (including training organized by external entities).	Article 6(1)(c) GDPR (legal obligation) Article 6(1)(f) GDPR (legitimate interest of the controller)		
<ul> <li>Execution of other employer rights related to employment and its legitimate interest, such as:</li> <li>Ensuring the security of employees and company assets at the Company's premises – video surveillance;</li> <li>Securing IT systems and ensuring appropriate access to information, facilities, and infrastructure;</li> <li>Verifying working hours and performance, proper use of company-provided tools, process optimization, and periodic performance evaluation (email monitoring);</li> <li>Sharing necessary data with colleagues within the company in connection with the performance of your job duties.</li> </ul>	Art. 6 ust. 1 lit. f RODO (prawnie uzasadniony interes administratora)		
<ul> <li>Use of Your Image:</li> <li>For employer branding purposes, including publication on the employer's website.</li> <li>For presentation within the internal intranet network.</li> </ul>	Article 6(1)(a) GDPR (consent) Article 6(1)(f) GDPR (legitimate interest)		



# **PROCESSING OF PERSONAL DATA FOR EMPLOYMENT PURPOSES**

Participation in surveys, employee or associate studies. If necessary, for the establishment, defense, and pursuit of claims.	Article 6(1)(f) GDPR (legitimate interest)			
For the purpose of conducting internal recruitment processes, if such		6(1)(a)	GDPR	
interest is expressed.	(consent)			
Participation in competitions and employee events.				
OBLIGATION TO PROVIDE PERSONAL DATA				

Providing personal data is necessary for concluding and subsequently performing the contract under which cooperation is established. This obligation arises from labor law provisions, particularly Article 22[1] of the Polish Labor Code. Failure to provide the required data may result in the refusal to conclude the contract, difficulties in its execution, or the inability to access certain employee benefits.

Providing personal data for purposes based on your consent remains voluntary.

### WHO MAY RECEIVE YOUR PERSONAL DATA?

Your data may be shared with postal and courier service providers, IT service providers and companies ensuring the functionality of IT tools and systems, professional advisors such as law firms, accounting and auditing firms, business partners and clients if you are designated as a company contact, as well as companies providing employee benefits, organizing training, or corporate events. Additionally, data may be shared with entities authorized by law, including the Tax Office (US), Social Insurance Institution (ZUS), National Labor Inspectorate (PIP), and Statistics Office (GUS). In exceptional cases, the Company may transfer data to entities located outside the European Economic Area (EEA), but only to the extent necessary. Data security is ensured through appropriate safeguards, such as standard contractual clauses approved by the European Commission.

### DATA RETENTION PERIOD

Personal data will be stored for the duration of employment and subsequently for the legally required period for archiving employment records, which is 50 years for contracts signed before January 1, 2019, and 10 years for contracts signed after this date. If cooperation with the Company is based on a contract other than an employment contract, personal data will be retained for the duration of the contract and, after its termination, until the expiration of legal claims, in accordance with civil law and tax regulations. Data processed based on consent will be retained until consent is withdrawn. Video surveillance recordings will be stored for a maximum of three months unless they serve as evidence in ongoing legal proceedings.

#### YOUR RIGHTS

You have the right to:

- Request access to your personal data.
- Request rectification of inaccurate or incomplete data.
- Request deletion or restriction of processing (in cases specified by GDPR).
- Object to data processing (where permitted by law), unless there are overriding legitimate grounds for processing or legal claims.
- Withdraw consent at any time (without affecting the legality of previous processing).

You also have the right to lodge a complaint with the President of the Personal Data Protection Office if you have concerns about the way your personal data is being processed.