## Firstpoint Poland Sp. z o. o. (FPP) Privacy Policy

This document provides general information concerning the processing of personal data, including what kind of personal data FPP may process, why FPP may process it and the rights of the data in this regard.

## **Definition of personal data**

Personal data is any information or opinion that relates to an individual who can be directly or indirectly identified. It is still personal data whether it is true or not, recorded in material form or not. The processing of personal data in Europe is governed by the EU General Data Protection Regulation (GDPR).

## Kinds of personal data do FPP processes

FPP may process (collect, store, possess, access, disclose, review and use) personal data for the following purposes:

- As a processor to provide contractual services to our customers and third parties successfully.
   FPP processes only data necessary to provide access to our services, technology platforms,
   solutions, to administer and manage user accounts, to provide user support, to investigate
   any complaints or questions client may raise:
  - Name, email address, username, profession, mobile number, the company person is working for or providing services to
- 1. As an administrator for employment purpose:

  Name, address, telephone number, e-mail address, next-of-kin, national ID-number, job
  position, bank account number, CV, health certificate, photos, copy of ID and diploma
- 2. As an administrator for recruitment purpose: Name, telephone number, e-mail address, CV

#### The way of collecting personal data

FPP processes data received by direct contact or via email with the data subject, third parties and publicly available sources.

The personal data is stored within European Economic Area. FPP performs strict access control, encryption of e-mail, logging of access, two-way authentication, high awareness of the personnel to ensure a high level of security.

## The way of processing personal data

FPP processes personal data according to protection and accountability principles. Processing is lawful, fair, and transparent. FPP processes data for the legitimate purpose specified explicitly to the data subject when FPP collected it. FPP collects and processes only as much data as necessary for the purposes specified. Kept personal data are accurate and up to date. FPP stores personally identifying data for as long as necessary for the specified purpose. Processing is done in such a way as to ensure appropriate security, integrity, and confidentiality.

## **Data protection rights FPP respects**

FPP is a data administrator and/or a data processor. The GDPR recognizes a list of privacy rights for data subjects. As an organization FPP understands those rights and ensure to be GDPR compliant. FPP respects right to be informed, to access, to rectification, erasure, restrict processing, object, data portability and rights in relation to automated decision making and profiling.

# Privacy complains, way of access and update personal data

To exercise all relevant rights to data rectification, erasure, portability, access and/or restricted processing, or any queries, complaints please contact:

Firstpoint Poland Sp. z o. o. mail@firstpoint.pl Polska 13A/321 81-339 Gdynia Poland