

**Information on the processing of personal data  
for participants in recruitment or applicants for employment  
at Syntom Metal Recycling Sp. z o.o.**

<p><b>Who is the controller of personal data?</b></p>	<p>Pursuant to 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: GDPR), we inform you that the controller of your personal data is <b>Syntom Metal Recycling Sp. z o.o.</b> based in Warsaw (02-672) Domaniewska 17/19/133 str. Poland (hereinafter: Controller).</p> <p>The Controller can be contacted via:</p> <ol style="list-style-type: none"> <li>1. by regular mail (by sending correspondence to the Controller's registered office address indicated above),</li> <li>2. email address: <a href="mailto:biuro@syntom.pl">biuro@syntom.pl</a>.</li> </ol> <p>The Controller is responsible for the security of the personal data provided and the processing of the data in accordance with the law.</p>
<p><b>For what purpose and on what legal basis do we process personal data?</b></p>	<p>Your personal data may be used by the Controller for the following purposes:</p> <ol style="list-style-type: none"> <li>1. fulfillment of the Controller's legal obligations related to recruitment, in particular under the provisions of the Labor Code or the provisions of the Civil Code (legal basis: Article 6(1)(c) GDPR - legal obligation),</li> <li>2. confirmation of the ability to perform work of a certain type or in a certain position (legal basis: Article 6(1)(b) of the GDPR - activities aimed at concluding a contract),</li> <li>3. conducting the recruitment process with the use of data other than those necessary for the conclusion of the contract (e.g. photos, information on marital status, interests, etc.), voluntarily provided by the recruitment participant (legal basis: Article 6(1)(a) GDPR, Article 9(2)(a) GDPR - consent),</li> <li>4. handling the recruitment process, including conducting ongoing communication (legal basis: Article 6(1)(f) GDPR - legitimate interest),</li> <li>5. asserting or defending against possible claims, related to the recruitment process, or in connection with the need to prove certain facts, which are important for the Controller in this regard (legal basis: Article 6(1)(f) GDPR - legitimate interest); the deadlines for asserting contractual claims are specified in detail in the Civil Code.</li> </ol> <p>In addition, you may voluntarily consent to participate in future recruitments conducted by the Controller and to participate in future recruitments organized by entities belonging to the Elemental Capital Group (legal basis Article 6. 1(a) GDPR).</p>
<p><b>What range of personal data will we process?</b></p>	<p>Personal data necessary for the conclusion of the contract and fulfillment of legal obligations are: name(s), surname, date of birth, contact information provided by the participant in the recruitment, and, if necessary for the performance of work in a specific position, also information about education, professional qualifications and history of previous employment.</p>

	The provision of data necessary for the performance of legal obligations and the conclusion of a contract is necessary to participate in the recruitment process, otherwise the provision of data is voluntary.
<b>Will the data be subject to profiling?</b>	Your personal data will not be used to make decisions based solely on automated processing of personal data, including profiling within the meaning of Article 22 of the GDPR.
<b>How long will we use the acquired data?</b>	<p>Personal data will be used for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:</p> <ol style="list-style-type: none"> <li>1. time necessary for the recruitment process,</li> <li>2. up to 12 months from the moment of consent or for the time indicated in the content of the consent, in case you voluntarily consent to the processing of personal data for future recruitment purposes,</li> <li>3. period until any effective withdrawal of consent to process personal data,</li> <li>4. period until any effective objection is filed.</li> </ol>
<b>What rights does the person whose data we process have?</b>	<p>You have the right to make a request regarding:</p> <ol style="list-style-type: none"> <li>1. access to data (including obtaining information on what data is processed by the Controller and to what extent, as well as obtaining a copy of the data) - details: article 15 of the GDPR,</li> <li>2. rectify data (i.e. correct it if the data processed by the Controller is incorrect or incomplete) - details: article 16 of the GDPR,</li> <li>3. deletion of data (if, for example, the data are no longer needed for the purposes for which they were collected or the Controller has no legal basis for processing the data) - details: article 17 of the GDPR,</li> <li>4. limitation of data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data are no longer needed by the Controller, but need to be processed because you are pursuing a claim) - details: article 18 of the GDPR,</li> <li>5. object to the processing of personal data, including profiling (if the personal data is processed on the basis of the legitimate interest of the Controller, or is used for direct marketing purposes) - details: article 21 GDPR,</li> <li>6. transfer of data to another controller (if the processing of data provided to the Controller is carried out by automated means, on the basis of consent or on the basis of a contract) - details: article 20 of GDPR.</li> </ol> <p>If the processing is based on consent, you have the right to withdraw consent at any time by any means. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.</p> <p>In addition, you have the right to lodge a complaint with the President of the Office for Personal Data Protection (supervisory authority) if you believe that the processing of your personal data violates the law (for more information: <a href="https://uodo.gov.pl/pl/83/155">https://uodo.gov.pl/pl/83/155</a>).</p>
<b>How to withdraw consent to data processing?</b>	The withdrawal of consent for the processing of personal data can be done, in particular, by contacting the Controller through the contact details indicated in this clause or through a dedicated email address: <a href="mailto:kadry@syntom.pl">kadry@syntom.pl</a> .

<b>To whom do we share data?</b>	With all guarantees of data security, we may transfer your data to other entities, including entities authorized to receive them under applicable laws, entities processing them on our behalf (e.g., technical service providers, hosting providers, analytics providers, entities providing us with consulting services) and other controllers (e.g., notary or law firms), including other Elemental Capital Group companies.
<b>How can I contact us about data protection issues?</b>	In matters related to data protection, you can contact the Controller through: <ol style="list-style-type: none"><li>1. e-mail address: <a href="mailto:gdpr@elemental.biz">gdpr@elemental.biz</a>.</li><li>2. of the Controller's mailing address indicated above.</li></ol>