

## **PRIVACY POLICY**

This Privacy Policy contains general information regarding Globe Group S.A.'s use (processing) of personal data of persons visiting or using the services provided by Globe Group S.A. through the websites published by Globe Group S.A.

Since we respect the privacy of our Users, we publish this Privacy Policy so that each User knows the extent to which their personal data is processed. This Policy describes the manner and scope of Users' data collection and indicates the purposes for which they are used, who they are made available to and how they are protected. In the Privacy Policy, the User will also find information on the Users' rights pursuant to the applicable provisions on personal data protection.

### **Definitions**

1. **the Administrator** – Globe Group S.A. with its registered seat in Poznań (61-808) at ul. Św Marcin 69, entered in the Register of Entrepreneurs of the National Court Register under number 0000756415, holding tax identification number (NIP) 7811907312, business registration number (REGON) 360905110, which processes Users' personal data as the administrator of the website <https://globegroup.agency/>.
2. **the Website/Page** – the website maintained at: <https://globegroup.agency/>, whose administrator is Globe Group S.A. with its registered seat in Poznań.
3. **the Internet Service** – shall mean the website or application by means of which the Administrator runs the Internet service, operating in the domain: <https://globegroup.agency/>,
4. **the Device** – shall mean an electronic device through which the User accesses the Website and the Internet Service, e.g. mobile devices, computers.
5. **the User** – shall mean an entity that uses the Administrator's Website or the Internet Service.

### **What are personal data?**

Personal data are information about an identified or identifiable natural person. Such data are, for example, the following information collected - through the Administrator's Website or the Internet Service: name and surname, e-mail address, or telephone number.

## What is GDPR?

On 25 May 2018. GDPR, i.e. 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, came into force. This is an EU regulation on the protection of personal data and on how they are secured. The GDPR came into force uniformly in all countries of the European Union. The GDPR provisions apply, among others, to the processing of personal data via the Internet, including via the Website and the Internet Service.

## Personal Data Controller

The Controller of the Users' personal data is Globe Group S.A. with its registered seat in Poznań (61-808) at Św. Marcin 69 Street, entered into the Register of Entrepreneurs of the National Court Register under number 0000756415, holding tax identification number (NIP) 7811907312, business registration number (REGON) 360905110. You can contact the Controller via e-mail: [biuro@globegroup.pl](mailto:biuro@globegroup.pl) and phone number: +48 61 847 40 07. The Controller has appointed a Personal Data Protection Inspector. You can contact the Personal Data Protection Inspector via phone number: 577008514 and via e-mail address: [katarzyna.misztal@globegroup.pl](mailto:katarzyna.misztal@globegroup.pl).

## Purposes and legal basis of personal data processing by the Controller

1. **Contact Form** – personal data are collected by the Controller to ensure proper use of the Internet Service. Personal data collected via the contact form placed on the Website are collected in order for the Controller to answer the question asked by the User, to contact the User or to send a commercial offer and to conduct marketing activities. Personal data is processed pursuant to the provision of Article 6(1)(a) of the GDPR, i.e. on the basis of the consent granted by the User.
2. **“Career” tab** – personal data collected via the Website - via the "Career" tab - is collected for the purpose of recruitment processes conducted by the Administrator. Personal data are processed on the basis of the provision of Article 6(1)(a) of the GDPR i.e. on the basis of the consent granted by the User.
3. **Personal data of the Administrator's Customers** are processed for the following purposes:
  1. concluding and performing the contract binding you and Globe Group S.A., i.e. to the extent necessary to perform the contract (Article 6(1)(b) of the GDPR).

2. asserting claims by the Controller, direct marketing, creating analyses, compilations and statistics for the Controller's own needs, i.e. to the extent necessary for purposes of the legitimate interests pursued by the Controller (Article 6(1)(f) of the GDPR)
3. fulfilling statutory obligations, e.g. in accounting and bookkeeping (i.e. Article 6(1)(c) of the GDPR).

### **Period of processing Users' personal data**

1. The Users' personal data, in connection with the purposes specified above, i.e. within the scope of data collected via the contact form available on the Website, will be processed by the Controller for a period of 3 years, unless the User revokes their consent within this period.
2. Personal data of the Users being job candidates provided in the Administrator's recruitment process via the "Career" tab will be processed for a period of 6 months from the date of completion of the recruitment process for the position applied for by the User. If the User gives consent for the Controller to conduct recruitment processes in the future, their personal data will be processed for a period of 2 years.
3. The personal data of the Controller's customers will be processed for the period of execution of the contract, the period resulting from tax regulations regarding the storage of invoices or the period of the limitations for claims.

If the User withdraws their consent to the processing of personal data by the Controller for the purposes indicated in sec.1 and 2 of this Privacy Policy, the data will not be processed by the Controller, unless there is another legal basis for their processing.

### **To whom do we transfer your data?**

The recipients of the Users' personal data are: the Administrator's employees and co-workers, entities operating ICT systems and providing IT tools, entities providing maintenance services, entities operating and maintaining the IT network, entities cooperating with the Administrator in the provision of marketing services, as well as entities providing advisory, legal, consulting and auditing services.

User data will not be transferred to third countries.

## What rights do Users have under the GDPR?

Users shall have the right to request that the Controller do the following:

1. provide the Users with access to the personal data provided by them and which concern them, subject to Article 15(3) of the GDPR (Article 15 of the GDPR);
2. rectify the data (Art. 16 of the GDPR);
3. erase the personal data provided by Users under the "right to be forgotten" (Article 17 of the GDPR);
4. restrict processing of the User's personal data (Article 18 of of the GDPR);
5. transfer User's personal data (Article 20 of the GDPR).

Users shall have the right to withdraw the granted consent to data processing at any time, which will not affect the legality of the processing, which was performed on the basis of consent before its withdrawal.

Users shall also have the right - in the case of the processing of personal data based on the Controller's legitimate interests, i.e. Article 6(1)(f) of the GDPR to object to processing of personal data concerning them at any time, pursuant to Article 21 of the GDPR. Accordingly, the Controller shall no longer process the Users' personal data subject to the objection on this basis, unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, exercise or defence of claims.

Users may exercise the above rights in the following ways:

1. by contacting the Personal Data Inspector appointed by the Controller via telephone number: 577008514 and via e-mail address: [katarzyna.misztal@globegroup.pl](mailto:katarzyna.misztal@globegroup.pl),
2. by sending a written request to the Controller's registered address: Globe Group S.A., 69 Św. Marcin Street, 61-808 Poznań

## **Complaint to the supervisory authority**

Users shall have the right at any time to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office, if they believe that the processing of their personal data by the Controller violates applicable laws.

## **Automated decision-making, including profiling**

Users' personal data processed by the Controller for the purposes indicated above will be processed in an automated manner (through the Administrator's Website and the Internet Service), however with regard to such data, the Controller will not be making decisions in an automated manner and also such data will not be profiled.

Information on cookies can be found in the [Cookies Policy](#) section.

## **COOKIES POLICY**

This Cookie Policy shall supplement the Privacy Policy with regard to the processing of personal data using cookies and other Internet technologies.

### **Definitions**

1. **Administrator/Company** – shall mean the company Globe Group S.A. with its registered seat in Poznań (61-808) at Św. Marcin 69, entered into the Register of Entrepreneurs of the National Court Register under No. 0000756415, holding tax identification number (NIP) 7811907312 and business registration number (REGON) 360905110, which processes personal data of the Users as the controller.
2. **the Website/Page** – the website which the User uses and whose administrator is Globe Group S.A.. with its registered seat in Poznań.
3. **the Internet Service** - shall mean the website or application by means of which the Administrator operates the Internet service running on the Website.
4. **the Device** – shall mean an electronic device through which the User obtains access to the Website and the Internet Service, e.g. mobile devices, computers.

5. **the User** – shall mean an entity that uses the Administrator's Website or the Internet Service.
6. **Cookies** – shall mean IT data (small text files) saved and stored in Devices through which the User accesses the Website or the Internet Service of the Company.
7. **Administrator's Cookies /Own Cookies** – shall mean IT data recorded and stored by the Administrator, related to the provision of electronic services by the Administrator via the Website or the Company's Internet Service.
8. **Third-party Cookies** – shall mean Cookies placed by the Administrator's partners, via the Company's Website or the Internet Service.

Information on the processing of personal data can be found in the [Privacy Policy](#).

### **What types of cookies are used by the Administrator?**

Cookies used by the Administrator are safe for the User's Device. These files do not allow viruses, other unwanted software or malware to enter the User's Device. Using cookies makes it possible to identify the software used by the User and to adjust the Website or the Internet Services of the Company to the needs of each User. Cookies contain information about the name of the domain they come from, the time they are stored on the Device, as well as their assigned value.

The Website or the Internet Services use two basic types of cookies: "session cookies" and "persistent cookies" :

1. "Session cookies" are temporary files that are stored in the User's device until logging off, leaving the Website or switching off the software (web browser).
2. "Permanent cookies" are stored in the User's device for the time specified in the parameters of cookies or until they are deleted by the User.

The User has the possibility to restrict or disable access of cookies to their Device. In the case of using the above options, using the Website or the Internet Services of the Company will be possible, except for the functions which require cookies to function.

### **For what purpose do we use cookies?**

Own cookies are used by the Administrator for the following purposes:

1. Configuration of the Website or the Internet Service by adjusting and optimising their content to the User's preferences, remembering the settings selected by the User and personalising the interface, browsing history in order to recommend content and font size, appearance of the Website or the Internet Service and other similar settings.
2. Creation of statistics which help to understand how the Users of the Website or the Internet Service use the websites, which enables improvement of their structure and content.
3. Remembering the User's location, which in particular enables the adaptation of information provided to the User taking into account their location.
4. Authenticating the User of the Website or the Internet Service and ensuring the User session for the purpose of maintaining a session of the Website or the Internet Service User (after logging in) - if applicable, thanks to which they do not have to re-enter their login, correct configuration of selected features of the Website or the Internet Service, as well as optimizing and increase of effectiveness of services provided by the Administrator.
5. Carrying out processes necessary for ensuring full functionality of the Website or the Internet Service by adjusting their content to the User's preferences and optimizing the use of these Websites or the Internet Service. In particular, these files enable recognition of the basic parameters of the User's Device and appropriate display of the Website or the Internet Service, in a manner adjusted to the User's individual needs.
6. Ensuring safety and reliability of the Website or the Internet Service consisting of processing certain information adequately to the purpose for which it was collected.

**How can I determine the conditions for storing cookies and the manner in which they access the Device?**

The User may individually adjust the settings concerning cookies, indicating conditions for storing them and for accessing the Device by these files. The User can change the settings referred to above by changing the settings of the Internet browser and by using the configuration of a given service. The settings can be changed in such a way as to block the automatic handling of cookies in the web browser's settings or inform about each placement of cookies on the User's Device.

Detailed information on the possibility and methods of using cookies in browsers is available in the software settings of the relevant web browser.

The User can delete cookies at any time using the available functions in their web browser. Applied restrictions on the use of cookies may affect some of the functionalities available on the Website or in the Internet Service.

### **Google Analytics**

The Administrator uses Google Analytics tools which collect anonymous information on User visits to the Website. This information relates, among other things, to the subpages visited by the User during their visit to the Website, the time they spend on the Website and the transitions between individual Websites in order to generate anonymous statistics on the functioning of the Websites and to enable analysis of Website activity so as to adjust the offer to the Users' needs in the best possible way.

### **Google Ads**

The Administrator uses Google Ads tools, thanks to which it can present the offer within the Google search engine and on the websites which are part of the Google advertising network. A user entering certain keywords in the search engine may receive a Globe Group S.A. advertisement. As part of Google Ads, the Company analyses the effectiveness of ads published on Google's websites so that the offer better matches the User's expectations. When the User clicks on a banner ad published by Google, cookies are saved on the User's computer as part of Google Ads. In this way, only statistical information is obtained which serves to identify the advertising banner.

### **How can I disable cookies in my browser?**

The possibility and manner of disabling cookies depends on the browser you use. Below, you can find the addresses of the creators' websites, where the possibility of disabling cookies is described:

1. Mozilla Firefox: <http://support.mozilla.org/pl/kb/blokowanie-ciasteczek>
2. Google Chrome:  
<http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>



3. Internet Explorer 7 i 8: <http://windows.microsoft.com/pl-pl/windows-vista/block-or-allow-cookies>
4. Internet Explorer 7 i 8: <http://windows.microsoft.com/pl-pl/windows-vista/block-or-allow-cookies>
5. Opera: <http://help.opera.com/Linux/9.22/pl/cookies.html>
6. Safari: <http://support.apple.com/kb/ph5042>