

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF CANDIDATES - POLAND

This information on the processing of personal data is in accordance with applicable law, including the General Data Protection Regulation ((EU) 2016/679) (GDPR). It contains information for potential employees and contractors about what personal data may be collected and stored and about the manner and purposes for which such data may be used.

WHAT IS THE PURPOSE OF THIS DOCUMENT?

As administrator, First Derivative Poland sp. z o.o. ("**First Derivative**", "**employer**", "**we**", "**us**") is responsible for making decisions about how to store and use your personal data. This information on the processing of personal data is intended to inform you how and why your personal data will be used for recruitment purposes and how long it will generally be stored. Through this document we provide you with certain information that we are obliged to provide in accordance with applicable law, including the General Data Protection Regulation ((EU) 2016/679) (GDPR).

DATA PROTECTION PRINCIPLES

We are obliged to comply with the laws and principles of data protection, and this means that your personal data will be:

- used in accordance with the law, fairly and transparently;
- collected only for legitimate purposes, which we have clearly explained to you, and will not be used in a manner inconsistent with these purposes;
- relevant to and limited to the purposes which we have informed you about;
- correct and up-to-date;
- stored only for the period necessary to achieve the purposes you were informed about;
- safely stored.

WHAT DATA WE HAVE ABOUT YOU

As you apply for a job or a contract with First Derivative, we collect, store and use the following categories of your personal data:

- data that you have provided to us in your CV and cover letter or other written documents;
- data covered by the recruitment or pre-engagement process, such as the results of interviews or logical tests;
- data that you have provided in the application form, such as name, position, address, telephone number, private e-mail address, date of birth, gender, education, course of previous employment, professional qualifications, availability, expected remuneration;
- any additional information that you voluntarily provide during the recruitment or pre-engagement process (e.g. photo, interests);
- provided by external personnel consulting agencies, recruiters or websites that publish job offers or contract opportunities, where applicable and to the extent permitted by applicable law;
- produced by interviewers based on their interaction with you;
- reco-services or references provided by others with your consent;

- and other data that we have collected during the recruitment process.

We do not collect, store or use any type of sensitive data unless it has been provided as part of additional information that you have voluntarily provided during the recruitment or pre-engagement process. If you are a disabled person and you believe that informing us about it is important for the recruitment or pre-engagement process, we will process such data based on applicable law. In other cases, if you choose to provide us with sensitive data, e.g. due to your particular situation, we will only be able to process it if you have given your explicit consent to the processing of such sensitive personal data. As a general rule, HR collects, stores and uses sensitive data only when a candidate is hired or awarded a contract by First Derivative.

HOW DO WE COLLECT YOUR DATA?

The personal data we collect about candidates comes from the following sources:

- from you, i.e. a candidate for a given position or contract (e.g. through applications submitted via the website or during recruitment events);
- generated during the recruitment or pre-engagement process;
- from online recruitment platforms;
- from employment portals;
- from external recruiters or personnel consulting agencies acting on our behalf or hired to act on your behalf;
- from commands;
- from publicly available professional sources, such as media and social networks (including LinkedIn);
- background checks, where applicable;

to the extent permitted by applicable law.

HOW WE WILL USE YOUR DATA

We will use the personal information we have collected about you to:

- assess your skills, qualifications and whether you are the right person for the position or the contract;
- informing you about the recruitment and pre-engagement process;
- keep you informed about new vacancies and opportunities;
- keeping documentation related to our recruitment and pre-engagement processes;
- ensure compliance with legal and regulatory requirements.

IF YOU DO NOT PROVIDE PERSONAL DATA

We will be unable to process your application if you do not provide us with your personal data that is necessary for us to process your application (e.g. to confirm your qualification or history of employment) and where such processing is based on our legitimate interest or the fact that the information is necessary for us to enter into a contract with you. To a limited extent, you can also voluntarily provide us with additional personal data.

LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

We will process your personal data based on the following legal bases:

- legal obligation resulting from the Polish Labour Code or the Polish Civil Code or other specific acts (in accordance with the requirements of a given job offer or contract) (e.g. to verify whether the candidate's skills and experience

correspond to the position or contract for which they are applying)

- The processing is necessary to take action at your request before concluding the contract (e.g. date of commencement of work, expected remuneration),
- our legitimate interest (e.g. to verify statements contained in your application and made during the recruitment or pre-engagement process),
- Your consent (e.g. if you voluntarily provide us with data that we do not require you to provide (e.g. a photo), or if you wish to be informed of future vacancies and opportunities).

HOW WE USE PERSONAL DATA OF SPECIAL CATEGORIES

If special categories data is provided to us during the recruitment or pre-engagement process, it will be used by us in the following ways:

- We use disability data to verify that we need to make appropriate changes during the recruitment or pre-engagement process, for example during tests or interviews.

CRIMINAL RECORD DATA

We collect criminal record data if the nature of the position or contract so requires and if it is legally permitted. This data is collected by the HR team.

If we would like to offer you a position or a contract, the HR team will collect information about whether you have been convicted of crimes in the past, acting in accordance with our pre-employment verification procedures (subject to successful verification to the extent permitted by law and the fulfillment of other conditions such as satisfactory references). We carry out criminal record checks to ensure that a previous criminal record does not make you unsuitable for a given position or contract. Where permitted by applicable law, we may engage third parties to carry out pre-employment verification on our behalf.

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a material impact on you based solely on automated decision-making.

DATA TRANSFER

As we are part of the FD Technologies group, a global organization, we will transfer your personal data within the FD group for the purpose of processing your application. We will also pass on your personal data to our potential or current clients for the sole purpose of assessing your skills, qualifications and whether you are a suitable candidate for the job or contract in question. We may also transfer your personal data to other recipients acting as separate administrators or our processors, e.g. recruitment agencies, state authorities, advisors, IT service providers, other service providers. We may also transfer your personal data in connection with a potential or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or part of the business, assets or shares to potential third parties that will be involved in such activities (e.g. with whom we may merge or through which we may be acquired in the future).

Data may be transferred on a global scale; however, our customers and other group entities are obliged to apply appropriate security measures and safeguards to protect personal data and may only process personal data for specific purposes.

The data will only be transferred outside the EEA if this is necessary for the processing of your application. First Derivative will also ensure appropriate data transfer mechanisms to protect such transfers in accordance with the requirements of the GDPR. We will use one or more of the following safeguards:

- data importers will be bound by standard contractual clauses approved by the European Commission that provide adequate data protection safeguards;
- personal data is transferred to a country (or territory) outside the EEA that is subject to an adequacy decision of the

European Commission (i.e. the country (or territory) has been found to have privacy laws that provide sufficient protection for personal data compared to the privacy laws in force in the EEA).

You can obtain a copy of the relevant safeguards or more detailed information about our data transfer strategy by contacting us.

SECURITY OF PERSONAL DATA

We use appropriate security measures to ensure that personal data is adequately secure against accidental loss, unauthorized use or access to such data, modification or disclosure. We limit access to your personal data to only those employees, intermediaries, associates and other third parties who must have access on a need-to-know basis. These persons process your data only at our request.

We have put in place procedures to deal with suspected data breaches and will inform you and the relevant regulatory authority of the suspected data breach where required to do so by applicable law.

DATA RETENTION

We will store your personal data for a period of six months from the date of our decision on whether to award you a contract. We will store your personal data for this period in the event that we need to repeat the recruitment or pre-engagement process and to defend against legal claims, to show no discrimination took place and that the recruitment or pre-engagement process was fair and transparent. After this period, your personal data will be safely destroyed.

In case we want to keep your personal data on file to contact you about future opportunities we will contact you to obtain your consent.

RIGHTS OF ACCESS, RECTIFICATION, ERASURE AND RESTRICTION OF PROCESSING

In accordance with applicable law, in certain circumstances, you have the right to:

- **request access** to your personal data (so-called "data subject access request"). This allows you to receive confirmation as to whether we have your personal data and, if so, a copy of that personal data and certain information about how we use it.
- **request the rectification** of your personal data that is in our possession. This allows you to rectify incomplete or incorrect personal data that is in our possession.
- **request the deletion** of your personal data. Thanks to this, you can request that we delete your personal data if there are no grounds for further processing. You can also request us to delete your personal data if you have already exercised your right to object to the processing (see below).
- **object to the processing of** your personal data if we process it on the basis of a legitimate interest (or a legitimate interest of third parties) and if your particular situation makes you want to object to the processing of your personal data on this basis.
- **request the restriction** of the processing of your personal data. Thanks to this, you can ask us to suspend the processing of some of your personal data, e.g. if you want to determine their correctness or the reason for their processing.
- **request the transfer** of your personal data to another entity.

Please contact us if you wish to review, verify, correct or request the deletion of your personal data, object to its processing, request the restriction of its processing or request a copy of it to another entity.

RIGHT TO WITHDRAW CONSENT

If we have received your consent to process your personal data, you have the right to withdraw your consent at any time by

contacting us. This will not affect the lawfulness of processing based on your consent prior to its withdrawal.

CONTACT US

Via post:

Addressee: HR Manager
ul. Grzybowska 2/29, 00-131 Warsaw, Poland

By Email;

privacy@epam.com

At any time, you have the right to lodge a complaint with the President of the Office for Personal Data Protection, the Polish supervisory authority for the protection of personal data (<https://uodo.gov.pl/en>). However, we will be grateful for the opportunity to respond to your doubts before you contact the President of the Office for Personal Data Protection, so please get in touch first.

Document Last Revised: 2 December 2024