Key Solutions Privacy Policy

Key Solutions Polska Sp. z o.o.

This policy explains how Key Solutions Polska Sp. z o.o. processes the personal data of people who use the www.key-ces.com website, contact the company, cooperate with it in business relationships, take part in recruitment processes, training, competitions and events, or receive marketing communications.

Document history

VERSION	AUTHOR OF CHANGE	DATE OF CHANGE
6	Grzegorz Zielke	14.10.2026

1 Data controller and contact

The controller of personal data is **Key Solutions Polska Sp. z o.o.**, with its registered office at ul. Wyścigowa 56E, 53-012 Wrocław, Poland, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław-Fabryczna in Wrocław, VI Commercial Division, under KRS number 0000324636, NIP (tax ID) 8992665881, REGON 020927856, share capital PLN 50,000 ("KEY" or the "Controller").

In matters concerning personal data, the Controller can be contacted by post at the registered office address given above or by e-mail at **gdpr@key-ces.com**. If the Controller appoints a data protection officer, their contact details will be published on the website in a way that allows direct contact.

2 Scope of the policy and basic terms

Personal data means information relating to an identified or identifiable natural person. **User** means, in particular, a person visiting the website, a candidate, a client, a participant in training, a competition or an event, a newsletter subscriber, or a person contacting KEY. **GDPR** means Regulation (EU) 2016/679 of the European Parliament and of the Council.

This policy concerns the processing of data by KEY. Where a KEY client or another group company is the controller in a given process, the person will receive separate information on the processing rules.

3 Purposes, scope and legal bases of processing

Depending on how the services are used, KEY may process identification data, contact data, data on employment and professional qualifications, billing data, the content of correspondence, information on participation in events, and technical data related to the use of the website, such as IP address, online identifiers, and information about the device and activity on the website. The scope of data is always limited to the information necessary for the given purpose.

– **Handling enquiries and contact** – contact data and the content of correspondence are processed in order to respond and to conduct further communication. The legal basis is taking steps at the person's request

prior to entering into a contract or performing a contract (Art. 6(1)(b) GDPR), and in other cases the Controller's legitimate interest in handling correspondence and running its business (Art. 6(1)(f) GDPR).

- **Cooperation with clients, suppliers and partners** – we process the data of contact persons (first name, surname, position, business contact details, content of correspondence) in order to establish, perform and settle the cooperation. The legal basis is the Controller's legitimate interest in cooperating with business partners (Art. 6(1)(f) GDPR) and, where required by law, a legal obligation (Art. 6(1)(c) GDPR). The data may come directly from the contact person, from their employer or from publicly available professional sources.
- **Reports of breaches of law (whistleblowing)** – we process the data of persons submitting reports to trustline@key-ces.com and of persons concerned by such reports in order to receive and examine the report and take follow-up action. The legal basis is a legal obligation under the Polish Whistleblower Protection Act of 14 June 2024 (Art. 6(1)(c) GDPR). Detailed rules are set out in the internal reporting procedure.
- **Provision of services, training, conferences and events** – the legal basis is the performance of a contract or taking steps prior to entering into it (Art. 6(1)(b) GDPR), as well as legal obligations, in particular tax and accounting obligations (Art. 6(1)(c) GDPR).
- **Competitions** – the legal basis is the performance of the competition rules, treated as a contract (Art. 6(1)(b) GDPR), and, where settlements are required, also a legal obligation (Art. 6(1)(c) GDPR).
- **Marketing and newsletter** – data is processed on the basis of the legitimate interest in promoting KEY's own services (Art. 6(1)(f) GDPR) and, where required by law, on the basis of consent (Art. 6(1)(a) GDPR). Commercial information is sent by e-mail, SMS or similar channels only after obtaining the prior consent required by Art. 398 of the Polish Electronic Communications Law of 12 July 2024.
- **Establishment, exercise and defence of legal claims** – the legal basis is the Controller's legitimate interest (Art. 6(1)(f) GDPR).
- **Website security and statistics** – to the extent necessary to secure the website, the legal basis is the Controller's legitimate interest (Art. 6(1)(f) GDPR); for technologies that require consent, Art. 6(1)(a) GDPR and Art. 399 of the Electronic Communications Law also apply.

4 Recruitment

In recruitment conducted for its own needs, KEY processes the data required by employment law on the basis of Art. 6(1)(c) GDPR in conjunction with Art. 22^1 of the Polish Labour Code, and the data needed to take steps prior to entering into a contract also on the basis of Art. 6(1)(b) GDPR. Data beyond the scope required by law is processed on the basis of voluntary consent (Art. 6(1)(a) GDPR), and special categories of data only where there is a basis under Art. 9(2) GDPR.

Consent is not required for the processing of data that an employer may request under the Labour Code. Consent may, however, be the basis for participation in future recruitment processes for a specified period and may be withdrawn at any time.

Where KEY conducts recruitment on behalf of a client, data may be shared with that client to the extent necessary to assess the application. The client's role and the rules for further processing will be presented to the candidate in the job advertisement, form or a separate information clause.

5 Data recipients and transfers outside the EEA

Data may be disclosed to entities providing KEY with IT, hosting, communication, recruitment, accounting, legal, training and marketing services, to operators of recruitment systems, to providers of analytics tools, and to entities authorised by law. Where appropriate, recipients may also include KEY clients and affiliated companies – solely to the extent consistent with the purpose of processing.

Where data is transferred outside the European Economic Area, KEY applies a mechanism ensuring the transfer complies with Chapter V GDPR, in particular a European Commission adequacy decision or standard contractual clauses together with the required supplementary measures. Information on the mechanism applied can be obtained by contacting the Controller.

6 Data retention period

Data is kept no longer than necessary to achieve the purpose, and thereafter for the period required by law or necessary for the establishment, exercise or defence of legal claims.

- correspondence and enquiry data – for the time needed to handle the matter, and thereafter for 12 months after it is closed, unless longer storage is necessary for the establishment, exercise or defence of legal claims;
- data of business partners' contact persons – for the duration of the cooperation, and thereafter until the limitation period for related claims expires;
- data related to a contract, training or event – for the duration of performance, and thereafter until the limitation period for claims expires; accounting documents – for 5 years from the end of the calendar year in which the tax payment deadline expired;
- marketing data – until an effective objection is raised, consent is withdrawn or the purpose ceases, depending on the legal basis;
- data from current recruitment – until the process ends, and thereafter for 3 months for the purpose of defending against possible claims; data for future recruitment (based on consent) – for 12 months or until consent is withdrawn earlier;
- whistleblowing report data – for the period set out in the Whistleblower Protection Act, as a rule 3 years after the end of the calendar year in which the follow-up actions were completed;
- cookie-related data – in line with the lifetime of the given cookie as shown in the consent management tool.

7 Rights of data subjects

Under the conditions set out in the GDPR, a person has the right to:

- access their data and obtain a copy of it;
- rectification of data;
- erasure of data;

- restriction of processing;
- data portability;
- object to processing based on Art. 6(1)(f) GDPR, including direct marketing;
- withdraw consent at any time, without affecting the lawfulness of processing carried out before its withdrawal;
- lodge a complaint with the President of the Polish Personal Data Protection Office (UODO).

Requests can be submitted using the contact details given in Section 1. The Controller responds without undue delay, as a rule within one month. In the cases set out in Art. 12 GDPR, this period may be extended by a further two months, and a manifestly unfounded or excessive request may result in a reasonable fee or a refusal to act.

8 Profiling and automated decisions

KEY may use information about a candidate's experience and preferences to match job offers, or data on website use to tailor marketing communications. Such activities may constitute profiling but do not produce legal effects concerning the person or similarly significantly affect them, unless otherwise stated in separate information and an appropriate legal basis and safeguards are in place. A person may object to profiling based on legitimate interest.

9 Cookies and similar technologies

The website uses cookies and similar technologies. Necessary cookies may be used without consent where they are essential for transmitting a communication or providing a service requested by the user. Functional, analytics and advertising cookies are activated only after consent has been obtained, in accordance with Art. 399 of the Electronic Communications Law and – where they involve the processing of personal data – Art. 6(1)(a) GDPR.

Users can accept or reject optional cookie categories and change their choice at any time in the consent management tool. Withdrawing consent does not affect the lawfulness of earlier activities. A detailed list of cookies, their providers, purposes and lifetimes is available in the Cookie Policy at www.key-ces.com and in the cookie settings panel.

10 Voluntary provision of data and data sources

Providing data is voluntary, but may be necessary to answer an enquiry, take part in recruitment, conclude or perform a contract, attend an event or receive commercial information. Failure to provide data may make it impossible to achieve these purposes.

As a rule, KEY obtains data directly from the person. Candidate data may also come from publicly available professional sources, recruitment agencies or referrers. In such cases, KEY may receive identification and contact data as well as information on education, qualifications, experience and employment history. The

person will receive the information required by Art. 14 GDPR within the period provided for in that provision, at the latest at the first contact, unless one of the exceptions provided for by law applies.

11 Data security

KEY applies appropriate technical and organisational measures commensurate with the risk, including access control, permission management, system security, and incident response procedures. Access to data is granted only to authorised persons and entities acting under appropriate agreements or legal provisions.

12 Changes to the policy

The policy may be updated in the event of changes in legislation, in the operation of the website or in processing activities. The current version is published on the website together with the date of update. If a change significantly affects the rights of individuals, KEY will provide information in an appropriate manner.

> *Detailed information on data processing in specific processes is also provided in the information clauses accompanying forms and job advertisements.*

English translation of the Polish document “Polityka prywatności Key Solutions”, version 6 (14.10.2026).