

PRIVACY POLICY

We are the company **Nettles Consulting s.r.o.**, ID No.: 117 75 025, with registered seat at Nad Jurečkem 249/15, Strašín, 251 01 Říčany ("**we**"). Within the scope of our activities, we provide consultancy in the field of IT recruitment and labor market trends, train and recruit new IT employees, intermediate the conclusion of their employment or other similar contracts with the employer and provide services related to information and cyber security.

As part of this, we may process your personal data. This document informs you how we process personal data if you are:

- our client who is looking for new employees and associates and to whom we advise on recruitment and labor market trends or information and cyber security ("**Client**"),
- a job seeker who uses our services in their job search, or if we provide career coaching to you ("**Job Seeker**"),
- a person who participates in our training courses ("**Training Participant**"); or
- you are a visitor to our website ("**Website Visitor**").

Our website: <https://nettles.cz/>.

In this document we inform you how we process your personal data as a data controller, why we do so, with whom we share your personal data or what your rights are in relation to the protection of your personal data.

The processing of personal data is governed by 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 ("**GDPR**").

A. PERSONAL DATA THAT WE PROCESS

We process your personal data only to the extent necessary for the purposes described below. We primarily obtain your personal data from our communications with each other, through the contact form on our website, if you wish to participate in training or use our other services. If you are a Job Seeker, we obtain your personal data directly from you through our peer-to-peer communications or online tools. We may also obtain your personal data from third parties, from your employer who is our contractual partner (e.g. in the situation where your employer signs you up for a training course we organize or if you communicate with us on behalf of the Client as a contact person) or on the basis of other referrals.

For the sake of clarity, we have divided the processed personal data into the following groups:

Client

- **Identification data**, which are the name of the company, its identification number and the name, surname and job title of the contact person.
- **Contact details**, which are the telephone number, e-mail address and registered office address.
- **Billing data**, such as the identification number, name and address of the payer or other entity, VAT number, bank account number, invoice amount, etc.

- **Job-related data**, i.e. information related to the position sought, the requirements of the candidate and the Client's activities and operations, and other information related to the contractual relationship the Client has entered into with us.
- **Data contained in communications**, i.e. information that you or your delegated person provide to us in the course of communication.

Job Seeker

- **Identification data**, which is your name and surname.
- **Contact details**, which are your telephone number, e-mail address and home address.
- **CV details**, which are all the details you provide in your CV or cover letter (e.g. education, work experience, references, knowledge and skills, etc.).
- **Job-related data**, i.e. information that the applicant provides to us in connection with the specific job (in particular, information about meeting the employer's requirements).
- **Data contained in communications**, i.e. information that you or your delegated person provide to us in the course of communication.

Training Participant

- **Identification data**, which is your name and surname.
- **Contact details**, which are your telephone number, e-mail address and home address.
- **Billing details**, such as bank account number, invoice amount and billing address and, if the payer of the invoiced amount is not the participant directly, the payer's details including name, identification number, VAT number, payer's address, etc.
- **Training related data**, such as information about your preferred training content and information you provide to us during the training.
- **Data contained in communications**, i.e. information that you or your delegated person provide to us in the course of communication.

Website Visitor

- **Contact details**, which is the e-mail or other contact you provide to us via our website.

B. PURPOSES OF PERSONAL DATA PROCESSING

We process your personal data as a data controller for the following processing purposes:

B.1 Performance of contractual obligations and provision of services (training, career counselling, selection procedure)

All our services are provided to you on the basis of a contractual relationship. We therefore process your data for the purposes of conducting pre-contractual negotiations, entering into a contract and the subsequent performance of rights and obligations under the contract, providing our Services, communicating with each other

regarding the performance of the contract and performing other activities related to the performance of the contract.

For this purpose, we process Identification Data, Contact Data and Data contained in communications about you. If you are a **Client**, we also process Billing data, Job-related data about you. If you are a **Job Seeker**, CV details and Job-related data. If you are a **Training Participant**, Billing data and Training related data.

The legal basis for this processing is the performance of a contract between you and us and the need to take steps before entering into a contract. Where, for example, your employee or other worker is not directly party to the contract, the legal basis for processing is our legitimate interest in the performance of any contract entered into.

The data is processed for the duration of the contractual relationship created by the conclusion of the contract and for the period necessary for the performance of the obligations arising from the contract, but always for a minimum of three years after the personal data has been obtained.

If you are a Job Seeker, we may transfer your personal data to Clients for the purpose of arranging the conclusion of an employment or other similar contract.

B.2 Offering new jobs and guiding the Job Seeker for possible future job

As part of our service, we may inform you of new job positions that would be suitable for you if you express interest as a job seeker. In this case, we will register you in our system for a period of time set out below and then contact you if a potential job opportunity arises. If you take this opportunity and we contact you with an offer, the processing will again be carried out in accordance with point B.1 of this Privacy Policy.

If you are a **Job Seeker**, we process Identification data, Contact details, CV details and Job-related data and Data contained in communications about you for this purpose.

The legal basis for this processing is the consent you give us.

In this case, we process the data for a period of three years from the date of consent or until you withdraw your consent to the processing of your personal data. However, if consent is withdrawn, this does not affect the lawfulness of the processing during the period between the consent being given and the withdrawal of such consent.

B.3 Newsletters

As part of our activities related to information and cyber security and recruitment of IT specialists, we prepare a quarterly e-mail newsletter with recommendations for improving security, information from the labor market and news in our portfolio.

Whether you are a **Client, Training Participant, Job Seeker or Website Visitor**, we process Contact details (specifically an e-mail address) about you for this purpose.

The legal basis for this processing is the consent you give us when you sign up to our newsletter. In this case, we process the data until you withdraw your consent to the processing of your personal data. However, if consent is withdrawn, this does not affect the lawfulness of the processing between the time of granting and the withdrawal of such consent.

B.4 Protecting our rights and legal interests

We may process your data to protect our rights and legal interests. In particular in connection with proceedings before judicial authorities and other public authorities, or in connection with the internal handling of your claims.

In order to protect our rights and legal interests, we process the following about you:

- If you are a **Client**, Identification data, Contact details, Billing data, Job-related data and Data contained in communications.
- If you are a **Job Seeker**, Identification data, Contact data, CV details and Job-related data.
- If you are a **Training Participant**, Identification data, Contact details, Billing data, Training related data and Data contained in the communication.

The legal basis for this processing is our legitimate interest in protecting our rights. We process the data for the duration of the time limits within which you can exercise your rights. Typically, personal data will be stored until 10 years after the end of the concluded contract or the termination of the cooperation (or even longer in the event of a dispute).

B.5 Compliance with legal obligations

We may also process your personal data in order to comply with our legal obligations, particularly in the areas of accounting and tax. This may occur in the event that a contractual relationship is established and financial performance is provided by you.

For this purpose, we process Identification data, Contact details, Data contained in communications, Billing data about you if you are a **Client** or **Training Participant**.

The legal basis for this processing is the performance of our legal obligations. The data is processed for the period required by law, for example in taxation for up to 10 years.

B.6 Ensuring communication

We may also process personal data for the purpose of ensuring mutual communication. This communication takes place when you fill in the contact form on the website, contact us via e-mail or if you have any questions about our services or our activities.

Whether you belong to any of the above groups of data subjects, we process Identification data, Contact details and Data contained in communications about you for the purpose of ensuring mutual communication.

The legal basis is our legitimate interest in providing the communication. The personal data is stored for the time necessary to process the mutual communication or, if a contractual relationship is established, for the duration of that contractual relationship.

C. SHARING OF PERSONAL DATA

We may use third parties to process personal data to help us provide our services or in some situations we may be required to share personal data. These third parties act as so-called recipients of personal data. Specifically, they are:

- clients who are our contractual partners and who are looking for suitable employees and associates through us;
- company that provides us with recruitment software for communication;
- companies that provide us with database management tools and records of contacts and candidates;
- Microsoft Ireland Operations Limited, which provides us with storage and e-mail services. If personal data would be shared with Microsoft Corporation, that company is registered with the Data Privacy Framework.
- Intuit Inc, which provides us with the Mailchimp newsletter tool. This company is registered with the Data Privacy Framework.
- company that provides us with a candidate search and management tool.

Where we share your personal data with controllers and processors in third countries (outside the EEA), we only do so where there is a decision by the European Commission that a particular country outside the EEA provides an adequate level of data protection, including where controllers or processors have adopted additional data protection measures such as Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs).

D. YOUR RIGHTS IN PROCESSING AND THE POSSIBILITY OF EXERCISING THEM

For all questions related to the processing of your personal data, whether it is a question, the exercise of rights, sending a complaint to us, etc., you can contact us via e-mail at info@nettles.cz.

Your request will be processed without undue delay, at most within 1 month. In exceptional cases, due to the complexity of your request, we are entitled to extend this period by a further 2 months. We will, of course, always inform you of any such extension and the reason for it.

You also have the right to lodge a complaint with the supervisory authority as described below.

D.1 Right of access

You have the right to obtain confirmation from us as to whether we are processing your personal data.

If we process your personal data, you also have the right to request access to information about the purpose and scope of the processing, the recipients of the data, the duration of the processing, the right to rectification, erasure, restriction of processing and to object to the processing, the right to lodge a complaint with a supervisory authority and the sources of the personal data (this information is already provided in this document).

You can also ask us for a copy of the personal data we process. We provide the first copy free of charge; further copies may be subject to a fee. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

D.2 Right to withdraw consent

You have the right to withdraw your consent to the processing of personal data at any time. However, the withdrawal of consent does not affect the lawfulness of the processing prior to such consent, nor does it lead to the termination of the processing of personal data that has already been anonymized.

D.3 Right to repair

You have the right to request us to correct inaccurate personal data concerning you. Depending on the purpose of the processing, you may also have the right to have incomplete personal data completed, including by providing an additional declaration.

D.4 Right to erasure (right to be forgotten)

You have the right to request the deletion of your personal data in cases where:

- we no longer need your personal data for the purposes for which it was collected or processed;
- you withdraw the consent based on which the personal data was processed and there is no further reason for processing it;
- you object to processing and there are no other overriding reasons for processing, or you object to processing for direct marketing purposes;
- personal data is processed in violation of the law.

However, you cannot exercise this right where the processing is necessary for compliance with our legal obligations or tasks entrusted to us in the public interest or for the establishment, exercise, or defense of legal claims.

D.5 Right to restriction of processing

You have the right to request restriction of the processing of your personal data in cases where:

- you contest the accuracy of your personal data; in this case, you may request a restriction of processing until the accuracy of the personal data has been verified;
- the processing is contrary to the law and instead of erasure, you request a restriction of the processing of personal data;
- We no longer need your personal data for the purposes for which it was collected or processed, but you require it for the establishment, exercise, or defense of legal claims;
- you have objected to the processing of your personal data; in this case, you may request a restriction of processing until it is verified that our legitimate interests prevail.

D.6 Right to portability

You have the right to obtain a copy of your personal data that we process by automated means based on your consent or for the performance of a contract. We will transmit this data in a commonly used and machine-readable format to you or to a controller designated by you, if technically feasible. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

D.7 Right to object

You have the right to object to the processing of your personal data that we process based on our legitimate interest. We will stop processing your data if there are no other overriding reasons for processing or if the processing is not necessary for the establishment, exercise, or defense of legal claims or if you object to processing for direct marketing purposes.

E. RIGHT TO FILE A COMPLAINT

You can also file a complaint with the relevant supervisory authority, which is the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Prague 7.

F. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of 1.1.2024. We may change this processing information from time to time, so please check it regularly. We will post any changes to this document on our website.