

## Travelplanet.pl information clause for applicants

### 1. Personal Data Controller

The controller of your personal data at the recruitment stage conducted within the Wirtualna Polska Holding capital group is Travelplanet.pl S.A., with its registered office in Wrocław (54-202), ul. Legnicka 48–50, building G.

Information on the individual companies belonging to the Wirtualna Polska Holding capital group, within which the recruitment is conducted, can be found, among other places, here: <https://holding.wp.pl/inwestor/struktura-grupy-kapitalowej>, as well as on the websites of the respective companies.

To the extent that candidates' personal data are transferred to other companies within the Wirtualna Polska Holding capital group and processed by those companies for the purposes of their own, separate recruitment processes, such companies act as independent personal data controllers.

We currently conduct recruitment for our companies operating in the tourism industry in Poland, the Czech Republic, Slovakia, Hungary, and Germany.

### 2. Data Protection Officer

We have appointed a Data Protection Officer. This is the person you may contact in all matters relating to the processing of personal data and the exercise of rights related to data processing in the recruitment process. You may contact the Data Protection Officer in the following ways:

- by post at: Travelplanet.pl S.A. / DPO / ul. Legnicka 48–50, building G, 54-202 Wrocław,
- electronically via e-mail: [daneosobowe@travelplanet.pl](mailto:daneosobowe@travelplanet.pl).

### 3. Purposes and Legal Bases for Processing

1) Conducting the recruitment process for the position you are applying for.

The legal basis for the processing is:

- performance of actions before entering into a contract (Article 6(1)(b) of the GDPR) about the following data: first name(s) and last name; date of birth; contact details; education; professional qualifications; and the course of previous employment;
- your consent (Article 6(1)(a) of the GDPR) about additional data that you choose to provide voluntarily in your CV, cover letter, or during the recruitment interview. Providing additional data, or data not required by us, will be treated as consent to the processing of such personal data. Granting consent in this case is voluntary, and consent given in this manner may be withdrawn at any time.
- our legitimate interest (Article 6(1)(f) of the GDPR) about data collected by us during the recruitment interview. We have a legitimate interest in verifying your skills and abilities, as this is necessary to assess whether you are a suitable candidate for the position for which we are recruiting.
- our legitimate interest (Article 6(1)(f) of the GDPR), consisting in the ability to conduct recruitment electronically, ensure efficient communication, and ensure proper identification

and, where necessary, verification of the candidate's identity in the system used to manage the recruitment process.

2. Assessment of your qualifications, abilities, and skills in future recruitment processes – the legal basis for the processing is your consent (Article 6(1)(a) of the GDPR);

3. Archival and evidentiary purposes – the legal basis for the processing is our legitimate interest related to the establishment, exercise, or defense of potential claims (Article 6(1)(f) of the GDPR);

4. Internal administrative purposes, including personnel management across the entire capital group for data exchange within the group, in particular in connection with HR management and the organizational structure, including assessing employment opportunities in another company, administrative, HR and payroll, and IT services, as well as group-level planning and reporting – the legal basis for the processing is our legitimate interest (Article 6(1)(f) of the GDPR);

5. Ensuring the safety of persons present on the Company's premises; video surveillance is used – the legal basis for the processing is the legitimate interest of the controller consisting in ensuring the safety of persons and property (Article 6(1)(f) of the GDPR). The processing is also necessary to comply with a legal obligation incumbent on the controller (Article 6(1)(c) of the GDPR in conjunction with Article 22<sup>2</sup> of the Polish Labour Code).

#### **4. Data retention period**

We will store your personal data for a period of one year from the date on which you submitted your application for a given position.

Recordings from video surveillance at the Company's premises are stored for a period not exceeding 30 days, unless they constitute evidence in proceedings conducted under the law or the controller has become aware that they may constitute such evidence.

#### **5. Recipients of Data**

We will transfer your personal data to:

a) Providers of services supporting us in conducting recruitment processes, e.g. IT service providers and the ATS service provider supplying the recruitment management system. Such entities process personal data based on an agreement concluded with us and in accordance with our instructions.

b) Other companies within the Wirtualna Polska Holding S.A. capital group for administrative purposes, including personnel management across the entire capital group for data exchange within the group, in particular in connection with HR management and organisational structure, administrative, HR and payroll, and IT services, as well as group-level planning and reporting.

To the extent that candidates' personal data are transferred to other companies within the Wirtualna Polska Holding capital group and processed by those companies for the purposes of their own, separate recruitment processes, such companies act as independent personal data controllers.

If the potential employer changes during the recruitment process, you will be informed of this before the process is completed.

Additionally, if you give your consent to the processing of personal data for future recruitment processes, we may transfer your personal data to companies within the Wirtualna Polska capital group, which includes Wirtualna Polska Holding S.A. with its registered office in Warsaw and its subsidiaries (<https://holding.wp.pl/inwestor/struktura-grupy-kapitalowej>).

## 6. Rights Related to the Processing of Your Personal Data

You have the right to:

- a) access your personal data;
- b) request the rectification of your personal data;
- c) request the erasure of your personal data;
- d) request the restriction of the processing of your personal data;
- e) object to the processing of your personal data – in cases where we process your data based on our legitimate interest;
- f) data portability, i.e., the right to receive your personal data from us in a structured, commonly used, machine-readable format. You may transmit such data to another data controller or request that we transmit your data to another controller, provided that such transmission is technically feasible. The right to data portability applies only to data that we process based on a contract with you or based on your consent;
- g) where your data are processed based on consent – to withdraw your consent to the processing of your personal data at any time. Withdrawal of consent does not affect the lawfulness of processing carried out based on consent before its withdrawal.

In order to exercise the above rights, please contact us or our Data Protection Officer (contact details provided in points 1 and 2 above).

You also have the right to complain to the President of the Personal Data Protection Office. This right applies solely to the lawfulness of the processing of personal data and does not concern the course of the recruitment process.

## 7. Voluntary Provision of Data

Providing personal data is voluntary; however, it is necessary to participate in the recruitment process.

## 8. Video Surveillance

We inform you that in the event of personal participation in a job interview at the premises of Travelplanet.pl S.A., a candidate may be within the range of video surveillance. The surveillance covers the entrance to the premises (entrance doors), the open-space area, and the social/common room.