

## **Privacy Policy – How we process your personal data**

### **Competition**

Considering that you have provided your personal data to us in the Competition entry form, we would like to tell you what we do with it (in accordance with the Regulation (EU) 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).

If you have any questions or concerns, please contact us at [privacy@GlobalLogic.com](mailto:privacy@GlobalLogic.com).

#### **I. What personal data we collect and what is the purpose and legal basis for its processing?**

The extent of personal information that we process includes information provided by you in the competition entry form: your name, surname and email address and/or phone number. You are not obligated to provide that data, although that would prevent you from taking part in the Competition. We may process information concerning your participation in the Competition (like the place you take in the Competition). We also process data necessary for tax settlements if you receive a prize (you are obligated to provide this data to us). If you agree to marketing communications, we will be unable to send them to you without your email address/phone number.

Data is collected for the purposes of organization, settlement and completion of the Competition, and also for the Organizer promotional purposes.

We can process your personal information also for the GlobalLogic promotional purposes, such as invitation to events and competitions organized by GlobalLogic or informing about interesting recruitment conducted by GlobalLogic, including, if you gave such consent, by email and/or telephone.

The legal basis in the scope related to your participation in the Competition is entering into and performance of a contract (the rules) (Article 6.1(b) of the GDPR), and for Organizer's promotion, defence against any claims and statistical purposes – our legitimate interests (Article 6.1(f) of the GDPR). For the necessary settlements, including tax and also any related archiving, we operate on the basis of applicable law (Article 6.1(c) of the GDPR).

#### **II. Retention period of your personal data**

Your data as a Competition Entrant will be processed for the period necessary for proper execution and settlement of the Competition, as a rule for 3 months, and for promotional purposes (like invitation to take part in other events organized by GlobalLogic, informing about interesting recruitment conducted by GlobalLogic) until you resign from data processing for that purpose, including receipt of any further invitations / newsletter (however, not less than 3 months).

Name and surname of the Competition winner may be published on the Internet (on social media on GL's profile and connected profiles), and therefore may be available in that medium indefinitely.

The period of processing may, however, be extended in case of any claims, in particular by the periods of their expiration, any disputes or if we are required to do so due to relevant legal requirement.

#### **III. Who has access to your personal data?**

Access to your personal data will be given exclusively to appropriately authorised employees or associates of GlobalLogic, partners, consultant or auditors – in the extent necessary to perform their responsibilities. Your data may be transferred, for example, to providers of hosting services or ICT services, other entities that provide to us technical or organizational assistance in the Competition, including communication with entrants or distribution of invitations, newsletter, etc. (e.g. couriers, Eventory capital group, Google capital group), including also companies from the GlobalLogic group.

GlobalLogic is a global company which means that some companies from the GlobalLogic group and our associated are located outside the European Economic Area (EEA). Each time when personal data is transferred outside the European Economic Area, GlobalLogic applies the required safeguards, including standard data protection clauses adopted pursuant to decisions of the European Commission. You can obtain a copy of the security measures we apply for the transfer of personal data to third countries by contacting us at [privacy@GlobalLogic.com](mailto:privacy@GlobalLogic.com).

In case of publishing the name and surname of the Competition winner on the Internet (on social media on GL's profile and connected profiles), the group of recipients of that data will be unlimited.

We may also be obligated – if there is a legal basis for that – to disclose certain information to public authorities as required by proceedings conducted by them or for tax reasons.

#### **IV. Data controller**

GlobalLogic Poland Sp. z o.o. based in Wrocław, ul. Strzegomska 48A, 53-611 Wrocław, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław-Fabryczna in Wrocław, 6<sup>th</sup> Commercial Division of the National Court Register, KRS: 0000835233, NIP: 8942924978, REGON: 020598186, share capital PLN 4,962,500; contact email address: [privacy@GlobalLogic.com](mailto:privacy@GlobalLogic.com).

#### **V. Your rights related to the processing of your personal data**

Access to data – you may request information from us on your personal data processed by us.

Data rectification – you have the right to request data rectification if data is/becomes incorrect or incomplete.

Consent withdrawal – you may withdraw your consent to the processing of your data at any time and it will not affect the lawfulness of processing based on consent before its withdrawal.

Data erasure – in some situations, if you want to have your data erased, GDPR guarantees you the so called “right to be forgotten”.

Restriction of processing – in certain situation, you can demand that we limit our processing activities, in principle - only to storing information about you.

Data portability – you have the right to receive your personal data in a commonly-used format that can be read by a computer, and also to have your personal data sent to another data controller.

Objection – in certain situations you have the right to object against the processing of your data, for example, for reasons related to your particular situation you may object to the operations performed by us when we base our processing on our legitimate interests.

When despite your objection we find that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or basis for the establishment, exercise or defence of legal claims, we will continue to process data covered by the objection to the extent necessary.

At any time you may object without cause to the processing for the purposes of direct marketing. Should you submit such objection, we will not be allowed to process your data for that purpose.

Complaint to the relevant supervisory authority – you are entitled to lodge a complaint to the supervisory authority; in Poland it is the President of the Personal Data Protection Office. Detailed description of the complaint procedure is available at: <https://uodo.gov.pl/pl/83/155>. The list of local supervisory authorities in the EU and their contact details are available at: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

If you have any concerns as to anything we do, please feel free to first contact us at [privacy@GlobalLogic.com](mailto:privacy@GlobalLogic.com).