

# Personal data processing policy

**TRASK SOLUTIONS a.s.**, Company ID: 62419641, with its registered office at Milevská 2095/5, Krč, 140 00 Prague 4 (hereinafter referred to as “Trask” or “we”) pays due attention to the protection of your personal data. This document is to inform you about the processing of your personal data and your respective rights (A) when you engage with us at recruitment fairs and similar outreach activities (talent pool), and (B) when you apply or participate in our recruitment processes as a candidate (recruitment). Please read this policy as applicable to your situation.

We process all personal data with the utmost emphasis on security and leverage appropriate technical, procedural and organizational means available to protect them, as we lay out in this document.

Should you have any inquiries, please contact our personal data protection team at <mailto:GDPR@thetrask.com>.

The latest version of this document is available at [www.wearetrask.com](http://www.wearetrask.com).

## Who processes your personal data?

We process your personal data as a controller of personal data, as we determine for what purpose and by what means your personal data will be processed.

To be able to connect you with the relevant person depending on why you shared your data with us, why you are contacting us or what position you are interested in, we may need to transfer your personal data for internal administrative purposes to other companies within our group, namely:

- **TRASK HOLDING a.s.**, Company ID: 29143829, with its registered office at Milevská 2095/5, Krč, 140 00 Prague 4.
- **TRASK SOLUTIONS Slovakia s.r.o.**, Company ID: 36766569, with its registered office at Mlynská Niva 16, 821 09 Bratislava — Staré Město, Slovak Republic.
- **TRASK Deutschland GmbH**, with its registered office at Hankensbüttel, Amtsgericht - Registergericht: Hildesheim HRB: 206352.
- **Trask Austria GmbH**, with its registered office at Opernring 1/R748, 1010 Wien, FB-Gericht: Handelsgericht Wien, FN: 524822y.
- **TRASK PREMIUM a.s.**, Company ID: 07723067, with its registered office at Milevská 2095/5, Krč, 140 00 Prague.
- **Team8 s.r.o.**, Company ID: 05533368, with its registered office at Milevská 2095/5, Krč, 140 00 Prague.
- **TRASK TELCO s.r.o.**, Company ID: 14051664, with its registered office at Milevská 2095/5, Krč, 140 00 Prague.
- **Bell & Hurry s.r.o.**, Company ID: 04757831, with its registered office at Lazarská 11/6, Nové Město, 120 00 Prague.
- **SINETA s.r.o.**, Company ID: 07994583, with its registered office at Husova 217/39, Mladá Boleslav II, 293 01 Mladá Boleslav.
- **Meonzi s.r.o.**, Company ID: 19211244, with its registered office at Milevská 2095/5, Krč, 140 00 Praha

However, only those companies that search for or recruit candidates, or those which manage these activities at the group level, will have access to your data. The companies listed above will process your personal data only to the extent and for the purposes specified herein.

In some cases, we may share your professional CV and other personal data with selected customers for whom you would work on our behalf. We will notify you about every instance of such sharing.

We may transfer your personal data to third countries outside the European Economic Area (EEA) only if such country ensures an appropriate level of personal data protection or appropriate safeguards for the protection of personal data have been adopted, in particular where standard privacy clauses have been agreed with the recipient.

## Who else is involved in the processing of your personal data?

We may use the services of other processors from time to time to process your personal data based on existing contracts on the processing of personal data between us and them that ensure the processors' compliance with personal data protection regulations. Such processors include:

- **Datacruit s.r.o.**, Company ID: 03545652, with its registered office at Václavské náměstí 846/1, Nové Město, 110 00 Prague 1, which may have access to your personal data in the event of technical maintenance of the Datacruit ATS system which we use to process personal data.
- **Geetoo CZ s.r.o.**, Company ID: 26846993, with its registered office at Klecandova 2380/1, 149 00 Prague 4, which processes personal data as a hosting provider for the operation of the Datacruit ATS system.
- **Codility Limited**, UTR: 2541910987, 107 Cheapside, London EC2V 6DN, United Kingdom, which processes personal data in a system that enables the processing of questionnaires and model scenarios, mainly for the purpose of evaluating your knowledge and experience.
- **TCC online s.r.o.**, ID No.: 24141089, with its registered office at Vlkova 46, 130 00, Prague 3, which processes personal data, including your responses to questionnaires, primarily to create an overview of your strengths, work style, and suitability for certain roles.
- **Teamprevent-Santé, s.r.o.** Company ID: 61854093, with its registered office at Pštrossova 192/24, Nové Město, 110 00 Prague 1, which, as a provider of occupational and medical services, may process your personal data in order to arrange and perform an initial medical examination.
- **Microsoft Ireland Operations Limited**, registered under the no. EVK05KS7XY1DEII3R011, with its registered office at 70 Sir John Rogerson's Quay, Dublin 2, Dublin, D02 R296, Ireland, that is provider of the cloud systems and storage facilities where data processing takes place.

## What personal data do we process?

The following section provides a detailed overview of the personal data we process, including examples. The data include:

- **Identifiers**, in particular your name and surname, birth number, date of birth, permanent residence address, Company ID and VAT number. For talent pool: name and surname.
- **Contact details**, in particular your contact address, phone number and e-mail address. For talent pool: phone number and e-mail address.
- **Academic background and work experience**, such as your education, previous career, completed courses and trainings, your interests, and photos, answers to specialized questionnaires, and solutions to model scenarios.
- **Information about soft skills**, such as your strengths, work style, or suitability for certain roles, which can also be determined based on your answers in questionnaires.
- **Records of mutual communication**, such as data on communication for the purpose of a selection procedure.
- **Data from public registers**, such as those appearing on an extract from the trade register or the VAT payers register, the insolvency register, the central registry of property executions, the database of invalid personal documents and sanctions lists.
- **Data from professional social media**, such as those published in your profile on LinkedIn.
- **Criminal conviction and offences data**, namely information from an extract from your Penal Register record.
- **For talent pool: Preferences** such as your indicated area of especially IT related interest (data, security, development etc).
- Other data that you provide us in your CVs and/or cover letters.

## How do we acquire personal data?

Most of the personal data that we process will be **provided by you as part of job negotiations**, for example, when you send us your CV or fill in your details in our online form, and/or when you respond

to questionnaires or develop solutions to model scenarios. For talent pool: talent pool: you provide your data voluntarily at fairs or other events and venues or via our online forms.

We may acquire some personal data from other sources, including:

- **publicly available sources** (such as public registers, websites, sanctions lists or professional social media);
- **from your former employers**; or
- **employment agencies or other intermediaries if you contact us through such entities.**

## Why do we process personal data?

We process your personal data only to the necessary extent and only if one or more of the following conditions are met:

- you have granted us your **consent**;
- there is a **legitimate interest** on our part;
- data processing is necessary for the execution and **performance of a contract** with you;
- there is a **legal obligation** that we have to comply with.

We may continue processing your personal data even after a withdrawal of your consent if such processing is necessary because of our legitimate interest.

**We may process your personal data without your consent for the following purposes:**

### a) Execution of a selection procedure

We process your identifying data, contact details, education and work experience data, information about soft skills, data from public records, data from professional social networks and criminal conviction and offences data for our legitimate interests related to hiring new employees and candidate selection, i.e., to be able to identify you as a suitable candidate, invite you to a job interview, stay in contact with you throughout the selection process and to assess your suitability for the position. The processing also includes a transfer of personal data to the relevant company within our group and verification of information about you as a candidate. We may also transmit anonymized data about your profile to our customers whose projects you would work on. We will process your personal data for this purpose only for the duration of the selection procedure.

### b) Consultation with customers regarding candidate profile suitability

We process your identifying data, contact details, education and work experience data, information about soft skills, data from public records, data from professional social networks and criminal conviction and offences data in order to consult your profile with customers in whose projects you would be involved and which you have explicitly approved, in order to take steps to conclude a contract between you and us. We will process your personal data for this purpose only for the duration of the selection procedure.

### c) Internal records and protection of our rights

We process your identifying data, contact details, education and work experience data, information about soft skills, data from public records, data from professional social networks and criminal conviction and offences data for our legitimate interests to keep internal records and to protect our rights in relation to keeping an internal record of selection procedures, and to protect our rights in the event of any dispute or supervision by public authorities. We may process your personal data for this purpose for a period of 5 years from the completion of the selection procedure or until the end of the respective dispute or proceedings, whichever of these periods will be longer.

### d) Compliance with legal obligations

The law stipulates multiple obligations for us. We need to process your personal data, namely identifying data and contact data, to be able to meet our legal obligations in the area of occupational health examinations. We will process your personal data for this purpose only for the period of time defined by applicable law.

## **We may process your personal data with your consent for the following purposes:**

### **e) Keeping records of applicants**

We process your identifying data, contact details, education and work experience data, data from public records, data from professional social networks and criminal conviction and offences data with your consent for the purpose of keeping records of applicants so that we can stay in touch with you and notify you of open positions that might be relevant to you. We will process your personal data for this purpose until you withdraw your consent.

### **f) Delivery of updates about Trask**

We process your identifying data and contact details with your consent for the purpose of informing you about news from Trask, to keep in touch with you, and to notify you, e.g., of new initiatives or upcoming events at Trask that might be of interest to you. We will process your personal data for this purpose until you withdraw your consent.

### **g) Talent pool**

We process your identifying data and contact details with your consent for the purpose of managing a talent pool and staying in touch with you, contacting you with job opportunities, internships/summer jobs, workshops, events and initiatives at Trask that match your interests, basic analytics for relevance and frequency of communication (no automated decision-making). We will process your personal data until consent withdrawal, or for a maximum of 5 years from granting the consent (whichever comes first).

## **How do we protect personal data?**

Ensuring the security of your personal data is one of our highest priorities. To this end, we have taken a range of measures to ensure the protection of your personal data, in particular to prevent unauthorized or accidental access to personal data, change, destruction or loss, unauthorized transfers, unauthorized processing, as well as other misuse of personal data.

We process your personal data exclusively through qualified personnel who are bound by confidentiality obligations. We carry out regular data protection and information security training of our staff.

We are also ISO 27001 certified and undergo annual audits for this purpose.

## **Your rights in relation to personal data protection**

You have legal rights associated with personal data protection that you may exercise at any time.

These include:

- **The right to withdraw consent.** You have the right to withdraw your consent at any time. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to object.** You have the right, for reasons relating to your particular situation, to object at any time to the processing of your personal data that may be carried out due to our legitimate interests, for the purpose of direct marketing, or to fulfil a task carried out in the public interest or in the exercise of public authority, should we be entrusted to such processing in the future. Should this concern data processing for direct marketing purposes, we will stop such processing without delay; in other cases, we will stop processing the personal data unless we prove serious legitimate grounds for processing that would override legitimate reasons on your part, or if we need to continue processing your personal data for determining, exercising or defending our legal claims.
- **Right to access personal data.** You have the right to know and obtain communication with regard to what personal data we process, for which purposes, the period for which the personal data are processed, the recipients of the personal data, and your rights associated with the processing of your personal data. All this information is included herein, but if you are not sure, you have the right to obtain from us comprehensive information about the processing and a copy of the personal data being processed. We will provide the first copy of your personal data free of charge, but we may charge a fee for additional copies.
- **Right to rectification.** You have the right to obtain from us without undue delay the rectification of inaccurate personal data and the right to have incomplete personal data completed, should you discover such inaccuracy or incompleteness.
- **Right to erasure.** You have the right to have your personal data erased if:

- your personal data are no longer necessary in relation to the purposes for which we have processed them;
- you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing on the grounds of our legitimate interests and there are no overriding legitimate grounds for the processing on our part; or
- if the personal data have been processed unlawfully or the personal data have to be erased for compliance with a legal obligation.
- **Right to restriction of processing.** You have the right to have the processing of your personal data suspended for a limited period of time if:
  - you contest the accuracy of the personal data; in such case we will suspend the processing for a period enabling us to verify the accuracy of the personal data;
  - the processing is unlawful, and you oppose the erasure of the personal data and requests the restriction of their use instead;
  - your personal data is no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or
  - you object to processing; in such case we will restrict the processing until we verify whether our legitimate grounds override yours.
- **Right to data portability.** You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller if the processing is based on consent and the processing is carried out by automated means.
- **The right not to be subject to automated individual decision-making with legal or similar effects, including profiling.** We never use your personal data for automated decision-making, including profiling. Any results of automated processing of personal data are always reviewed and evaluated by a human being.
- **The right to lodge a complaint with the supervisory authority.** Without prejudice to any other means of administrative or judicial protection, you have the right to lodge a complaint with the respective supervisory authority. The competent supervisory authority for the Czech Republic is the Office for Personal Data Protection residing at: Pplk. Sochora 27, 170 00 Prague 7, URL: [www.uoou.cz](http://www.uoou.cz); other data recipients should refer to their respective national data protection authorities, the list of which is also available on the website [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## Contacts and information about exercising your rights

Should you have any inquiries, complaints or requests regarding the protection of your personal data, you can contact us by e-mail at: [GDPR@thetrask.com](mailto:GDPR@thetrask.com).

We will process your application without undue delay, but no later than in one month. In exceptional and more complex cases, we may extend this period by up to another two months, of which we will duly notify you including the justification for such delay.

In some cases, we may ask you to prove your identity. This is a precautionary security measure to prevent access to your personal data by unauthorized persons.