

1.

General Provisions

This Privacy Policy describes the protection of personal data in connection with the processing of data by 90mph Consulting Łukasz Bielawski pursuant to Regulation of the European Parliament and of the Council (EU) 2016/679 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 (the “GDPR”).

2.

Personal Data

1. The Controller of your personal data is 90mph Consulting Łukasz Bielawski with its registered office in Legionów (05-120), at street Mieszka I-ego 25 (hereinafter referred to as “90mph”).
2. 90mph may process personal data:
 - a) for the purposes of recruitment based on the activities necessary to enter into and perform a contract (point (b) of Article 6(1) of the GDPR); comply with legal obligations (point (c) of Article 6(1) of the GDPR), and based on the consent of a candidate (point (a) of Article 6(1) of the GDPR);
 - b) in order to send marketing communications based on consent (point (a) of Article 6(1) of the GDPR);
 - c) for the purposes of contact and in order to present an offer based on the legitimate interests of 90mph (point (f) of Article 6(1) of the GDPR);
 - d) in order to enter into and perform contracts based on the legitimate interests of 90mph (point (f) of Article 6(1) of the GDPR), or based on the activities necessary to enter into and perform a contract (point (b) of Article 6(1) of the GDPR);
 - e) for the purposes of web analytics based on the legitimate interests of 90mph (point (f) of Article 6(1) of the GDPR), manifesting itself in the optimisation and improvement of the quality of website experience, as well as for remarketing purposes based on consent (point (a) of Article 6(1) of the GDPR), in particular according to the terms and conditions of the Cookie Policy;

3.

The Processing of Personal Data for Recruitment Purposes

1. In the case of recruitment for a position for which employment under a contract of employment is planned, personal data will be processed to the extent specified in the provisions of labour law in order to carry out the current recruitment procedure (point (c) of Article 6(1) of the GDPR in connection with Article 22 of the Labour Code and §1 of the Regulation of the Minister of Labour and Social Policy of 28 May 1996 regarding the scope of documentation kept by employers on matters concerning employment relationships and the manner of keeping personnel files of employees), whereas other data, will be processed based on consent (point (a) of Article 6(1) of the GDPR), on the proviso that we will consider sending application documents to us to be a clear affirmative action for the consent.
2. In the case of recruitment for a position for which employment under civil law contracts or business cooperation (B2B) is planned, personal data will be processed based on taking the necessary steps prior to entering into a contract that are performed at a candidate's own initiative (point (b) of Article 6(1) of the GDPR).
3. If you agree to participate in future recruitment processes or you want take part in the recruitment of our clients, your data will be processed based on consent (point (a) of Article 6(1) of the GDPR). If you consent to the processing of your data, you have the right to withdraw your consent, which shall not affect the lawfulness of processing based on consent before its withdrawal.
4. Your personal data may be provided to us by pracuj.pl, recruitment agencies or a person who has recommended you as a job candidate. Nevertheless, the transfer of such data always takes place based on your explicit request (job application, submission of a CV, or express consent).
5. Data may be disclosed to recruitment agencies that help us recruit. If you agree to take part in the recruitment of ours clients data provided for this purpose will be made available to them.
6. Your data will be processed for the period necessary to enter into a contract, including in order to conduct the recruitment process. If you agree to participate in future recruitment processes or in case of taking part in the recruitment of our clients, your data will be processed to withdraw your consent.

4.

The Processing of Personal Data for the Purposes of Contact

1. Providing data for contact purposes and in order to receive a response to an inquiry, including in order to have an offer presented is voluntary, but failure to do so will prevent us from sending a response to your inquiry.
2. Apart from the data that you provide to us for contact purposes on your own, we can also obtain your other data, including your first name, surname, telephone number and e-mail address so that we could contact you.
3. Sources from which the personal data referred to above may come include websites of your employers or companies, social networks, including LinkedIn and Goldenline, as well as our business partners.
4. The data provided for this purpose will not be made available to other entities.
5. The data provided for this purpose will be processed for one year after the inquiry date.

5.

The processing of Personal Data for Sending Marketing Communications

1. In the case of consent for marketing purposes, marketing information, including the 90mph newsletter, will be sent to your e-mail address.
2. The newsletter may contain commercial communications, as well as information on the latest products, services and news of 90mph.
3. Providing personal data for the purpose of sending marketing content to your e-mail address is voluntary, but failure to do so will render sending such marketing content impossible.
4. The data provided will not be made available to other entities.
5. The data transferred for the purpose of sending marketing content will be processed until the consent to the processing of personal data for marketing purposes is withdrawn, but for no longer than it is necessary to achieve the purpose for which the data were collected.
6. Data subjects may at any time opt out of receiving further commercial communications via e-mail by clicking the opt-out link (“I don’t want to receive messages”) that can be found in the footer of each e-mail.
7. 90mph considers using this button as the withdrawal of your consent to the processing of data for marketing purposes.

6.

The Processing of Personal Data in order to Enter into and Perform Contracts

1. Personal data of persons representing the Parties will be processed in order to enter into and perform commercial contracts based on the legally justified interests of 90mph (point (f) of Article 6(1) of the GDPR), manifesting itself in entering into contracts in accordance with the rules of representation. The data will also be processed on this basis in order to perform a contract, and defend against legal claims of the opposing party related to the existing contracts.
2. If a contract is entered into with a sole proprietor or a consumer, personal data will be processed for the purpose of performing the contract (point (b) of Article 1(6) of the GDPR).
3. Providing your personal data is voluntary, but failure to do so can render entering into a contract impossible.
4. 90mph informs you that the data will be processed throughout the period of contract performance, on the proviso that this period may be extended by the period of limitation of claims resulting from non-performance or improper performance of the contract. This period will be counted from the date of termination or expiry of contracts.

7.

The Processing of Personal Data for Data Analytics Purposes and for Marketing/Remarketing Based on Online Identifiers

1. Detailed rules for the processing of such data for such purposes are defined in the Cookie Policy.
2. The provision of personal data is voluntary.
3. 90mph uses Facebook Pixel – marketing tools provided by Facebook Inc., 1601 S. California Ave. Palo Alto, CA 94304, USA. They make it possible to target advertising campaigns on Facebook. As a result, Facebook is aware that the person registered is using the Portal. Facebook is the controller of the data thus collected. The Portal does not provide any additional personal data to Facebook. The service is based on the use of Cookies on the User's End Device. The information collected on Facebook Pixel is anonymous, i.e. it does not allow for identification. For more information, see the [Facebook Data Policy](#).
4. We use Google Ads marketing tools provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Google Ads is used to promote our website in search results and on third party websites, including the use of remarketing tools. Any activities in this regard are based on your consent to the use of your cookies according to the terms and conditions of the Cookie Policy. The functionality of Google Ads consists of

leaving a Google cookie on the User's End Device, which uses the ID associated with the visited pages to display interest-based ads. For more information on how Google Ads processes data, see [Google Privacy Policy](#).

5. 90mph also uses Google Analytics, a tool for creating and analysing statistics and for website optimisation provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. This tool collects data using cookies. Cookies may be used by advertising networks, in particular by the Google network, to display advertisements that are adjusted to the User's behaviours on the Website. To this end, they can store information about the User's navigation path or time spent on a given page. Google LLC is the controller of the data thus collected. To learn about the rules for the use of Cookies by an external controller, please read [Google Privacy Policy](#).

6. The transmitted data will be processed:

- For the purpose of analytics – for 36 months after the last visit to the Website;
- For marketing and remarketing purposes – for 12 months after the last visit to the Website.

8.

Rights of Natural Persons

1. The persons whose data are processed for the purposes referred to above have the following rights with regard to the processing of personal data:

- the right to withdraw their consent, if the basis for our processing is the consent;
- the right of access to personal data;
- the right to have personal data rectified;
- the right to request the erasure of personal data;
- the right to demand the restriction of personal data processing;
- the right of data portability if the basis for the processing is the consent given or the contract concluded, and the processing of personal data is carried out by automated means;
- the right to object to the processing of data if the basis for the processing of such data by us are the legitimate interests of 90mph;
- the right to lodge a complaint with an authority – the data subject also has the right to lodge a complaint with a data protection supervisory body, i.e. the President of the Office for Personal Data Protection.

2. In the case of data processing for the purposes of web analytics and marketing/remarketing based on online identifiers, the rights listed in b)–g) can be

exercised by data subjects according to the terms and conditions specified by Google LLC ([Google Privacy Policy](#)) and Facebook ([Facebook Data Policy](#)).

9.

Additional Information

If you have any questions or concerns about means and principles of processing, as well as the exercise of your rights, please contact us by e-mail at: lukasz.bielawski@cybersquare.com, lukasz.bielawski@90mph.pl

10.

Security Measures

90mph ensures the protection of the integrity and confidentiality of personal data transmitted via the Internet in particular by means of encryption.

11.

Other Data Recipients

The data will not be made available to entities other than those authorised under law, and only at their justified request. Data may be disclosed to IT support companies and hosting companies.