

PRIVACY POLICY OF THE „JOBROWSE” APPLICATION

1. DEFINITIONS

- 1.1. Whenever the following terms are used in this Privacy Policy, they shall have the meanings set forth below:
- a) **Controller or Operator** – **JOBROWSE Spółka z ograniczoną odpowiedzialnością** with its registered office in Warsaw, address: ul. Nowogrodzka 50 / 510, 00-695 Warsaw, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw under KRS number: 0001196543, holding NIP (Tax ID): 7011279400 and REGON (Statistical ID): 542825442.
 - b) **Personal Data or Data** – any information relating to an identified or identifiable natural person, including the device's IP address, location data, online identifier, and information collected via cookies and other similar technologies.
 - c) **Policy** – this Privacy Policy.
 - d) **GDPR** – 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.
 - e) **Application** – the „Jobrowse” web application along with all the functionalities available through it.
 - f) **User** – any natural person using the Application or one of the functionalities described in the Policy.

2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE APPLICATION

- 2.1. In connection with the User's use of the Application, the Controller collects data to the extent necessary to provide the specific services offered, as well as information about the User's activity within the Application. Detailed rules and purposes of processing Personal Data collected during the User's use of the Application are described below.
- 2.2. Contact with the Controller is possible via:
- a) **E – mail address:** contact@jobbrowse.com
 - b) **Correspondence address:** as indicated in point 1.1. lit a.

3. PURPOSES AND LEGAL BASES FOR DATA PROCESSING

APPLICATION AND USER ACCOUNT MAINTENANCE

- 3.1. Personal data of all persons using the Application (including first name, surname, e-mail address) are processed by the Controller for the purpose of providing services by electronic means in the scope of making the content and functionalities of the Application available to Users (registration, handling of

recruitment processes). The User may also voluntarily supplement their profile with additional information, such as a photo, residential address, age, or recruitment documents).

- 3.2. Legal basis: Necessity of processing for the performance of a contract to which the data subject is a party (Article 6(1)(b) of the GDPR).

REVERSE RECRUITMENT AND MATCHING SYSTEM

- 3.3. The Controller processes data regarding the User's professional preferences and competencies for the purpose of maintaining an intelligent offer matching system. The objective of the processing is to enable companies to apply to those Users who most closely match the sought candidate profile and to eliminate inefficient recruitment processes.
- 3.4. The system within the Platform functions as a career advisor, processing data regarding the User's financial expectations and experience.
- 3.5. This processing includes automated decision-making, including profiling, which aims to select and present anonymous Talent offers to those Employers whose inquiries demonstrate the highest degree of compatibility with the User's profile.
- 3.6. The algorithms have been designed based on substantive indicators of potential and skills, excluding demographic data, which is intended to prevent discrimination in the selection process.
- 3.7. The Controller processes data regarding interactions between the job-seeking User and the User offering employment (acceptance/rejection of a contact request) in order to optimize the relevance of future recommendations and shorten the duration of recruitment processes.
- 3.8. Legal basis:
- a) **Necessity for the performance of a contract** to which the User is a party (Article 6(1)(b) of the GDPR) for the provision of services by electronic means (implementation of the reverse recruitment model).
 - b) **Legitimate interest of the Controller** (Article 6(1)(f) of the GDPR) consisting in improving the processes of matching labor market parties and ensuring recruitment objectivity through data anonymization.

SHARING DATA WITH THE EMPLOYER

- 3.9. Upon acceptance by the User of a contact request or an offer sent by an Employer via the Jobrowse search engine, the Controller shall make available the User's necessary data (including first name, surname, e-mail address, telephone number, and the full content of the previously anonymous offer) to the Employer for the purpose of enabling direct contact and continuing the recruitment process.
- 3.10. **Legal basis:** Necessity for the performance of a contract, i.e., the implementation of the reverse recruitment service and enabling contact with the selected employer (Article 6(1)(b) of the GDPR).

MARKETING AND COMMUNICATION

- 3.11. The Data Controller processes personal data for the purpose of conducting direct marketing of its own services (notifications regarding new features, promotions).
- 3.12. **Legal basis:** The Controller's legitimate interest (Article 6(1)(f) of the GDPR) based on the consent granted for direct marketing in the case of electronic communication (e-mail/push notifications).

EXERCISE OF CLAIMS

- 3.13. The Controller processes data for the purpose of potentially establishing, exercising, or defending against claims.
- 3.14. **Legal basis:** The Controller's legitimate interest consisting in the protection or pursuit of claims (Article 6(1)(f) of the GDPR).

4. COOKIES AND TRACKING TECHNOLOGIES

- 4.1. The Controller and trusted partners use cookie technology (or similar mobile technologies, e.g., Android/iOS advertising identifiers) within the Application.
- 4.2. The Controller processes User data using these technologies for the following purposes:
 - a) **Service provision:** Maintaining the User's session, remembering preferences (Basis: Article 6(1)(b) of the GDPR).
 - b) **Analytics:** Analyzing the manner of Application use to improve its functionality (Basis: Article 6(1)(f) of the GDPR – legitimate interest).
- 4.3. The User may at any time change the settings regarding identifiers and cookies in the settings of their mobile device or browser. Below are links to example official websites of the manufacturers of the most commonly used browsers:
 - a) **Safari:** <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
 - b) **Google Chrome:** <https://support.google.com/chrome/answer/95647?hl=pl>
 - c) **Samsung Internet:** <https://www.google.com/search?q=https://www.samsung.com/uk/support/mobile-devices/using-samsung-internet/>

5. DATA SOURCE AND OBLIGATION TO PROVIDE DATA

- 5.1. As a general rule, the Controller collects data directly from the User or from persons acting on their behalf.
- 5.2. In specific cases (pursuant to Article 14 of the GDPR), data may originate from persons acting on behalf of the User, referrers, or headhunters who have entered their Data into the Application system. In such cases, we process data in the following scope: First Name, Surname, E-mail/Telephone, Company Name, and data regarding advertisements for the purpose of delivering an invitation.
- 5.3. Providing data is voluntary but necessary to create an Account and use the Application (within the scope of registration data). Failure to provide data will prevent participation in recruitment processes through the Application.

6. DATA RETENTION PERIOD

- 6.1. As a general rule, data is processed for the duration of the service provision (possession of an **Account**), until consent is withdrawn, or an effective objection is lodged.

- 6.2. The data processing period may be extended in cases where processing is necessary to establish and pursue potential claims or defend against them. After this time, data is processed only in the cases and to the extent required by law (e.g., tax data for a period of 5 years).

7. DATA RECIPIENTS

- 7.1. In connection with the provision of services, personal data will be disclosed to external entities, including in particular:
- a) **Employers (including entities recruiting on someone else's behalf):** Third parties actively seeking talent in the Jobrowse database to whom the User has disclosed their identification data by accepting a contact request (uncovering an anonymous offer).
 - b) **IT Service Providers:** Entities providing cloud infrastructure, hosting services, mailing systems (newsletter), as well as analytical tools and AI models supporting the process of matching offers and market benchmarking.
 - c) **Payment Operators:** Entities performing electronic payment services in the event of a purchase by the User (Employer or Talent) of paid subscription plans (e.g., Premium).
- 7.2. The Controller reserves the right to disclose selected information to competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with the provisions of applicable law.

8. RIGHTS OF DATA SUBJECTS

- 8.1. Every person has the right to request access to their data, its rectification, erasure, portability, restriction of processing, and to object to the processing of their data.
- 8.2. To the extent that profiling occurs within the system, the User has the right to obtain human intervention from the Controller, to express their own point of view, and to contest the decision if it affects their legal situation or significantly affects them.
- 8.3. Every person has the right to lodge a complaint with the President of the Personal Data Protection Office.

9. CHANGES TO THE PRIVACY POLICY

- 9.1. The provisions of the Privacy Policy may be improved and amended, and the latest versions will be published in the Application each time and will be accompanied by the date of the last update.
- 9.2. Date of last update: March 17, 2026.