

PRIVACY POLICY

Privacy Policy:

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On the basis of what legal provisions are or may be processed your personal data?

The rules on the protection of personal data (hereinafter referred to as the GDPR) are set out, inter alia, in 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 (General Data Protection Regulation) (Text with EEA relevance), the Act of 10 May 2018 on the Protection of Personal Data and in country related special acts (lex specialis).

Important terms

1. "**Personal data**" - means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name and surname, identification number, location data, internet identifier or one or more specific physical, physiological, genetic, mental factors, economic, cultural or social identity of a natural person,
2. "**Processing**" - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction,
3. "**Controller**" - means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law,
4. "**Supervisory authority**" - means an independent public authority which is established by a Member State,
5. "**Recipient**" - means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing,
6. "**Processor**" - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller,
7. "**Third party**" - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data,

8. **"Third country"** - an entity outside the EEA (European Economic Area) to which personal data is disclosed,
9. **"Consent"** - of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her,
10. **"Privacy Policy"** - this document, presenting information on the principles of personal data processing in accordance with the substantive scope indicated in art. 13 GDPR - information clause regarding the processing of personal data,
11. **"Cookies Policy"** - information on the use of cookies on the website run by the Controller. The Cookie Policy is available on the Controller's website,
12. **"GDPR"** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (General Data Protection Regulation): <https://uodo.gov.pl/pl/404>.

Who does this Privacy Policy apply to?

This Privacy Policy (hereinafter referred to as PP) applies to the processing of personal data of natural persons, natural persons conducting sole proprietorship and persons acting on behalf of legal persons, i.e. persons appointed to represent a legal person, proxies, employees and / or associates acting on behalf of a legal person. The categories of personal data concerned are natural persons acting alone, natural persons acting on behalf of organizational units without legal personality, natural persons acting on behalf of legal persons (e.g. as members of their bodies, proxies, contact persons), e.g. at the beginning of preceding the conclusion of the contract or after its conclusion.

Who is the Controller?

Please be advised that Controller is Fulqrum Games S.A. with headquarters in Warsaw, address: Krakowiaków 36 Street, 02-255 Warsaw, KRS 0000660225.

Contact details to the Controller

Please send inquiries regarding the protection of personal data to the Controller by traditional mail to the above-mentioned address or by e-mail to the address dpo@fulqrum.games.

Data Protection Officer

Please be advised that the Controller has not appointed a Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address: dpo@fulqrum.games.

For what purposes is or can your personal data be processed?

Personal data is or may be processed for the following purposes:

No.	Purpose of processing	The scope of data	Lawfulness of processing
1.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: name, surname, ID number, position, e-mail address, telephone number, 2) in the case of legal persons: name and surname, position, e-mail address, telephone number,	1) in the case of natural persons: art. 6 (1) b), f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,
2.	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	1) in the case of natural persons: name, surname, ID number, position, e-mail, telephone number, registration data (e.g. NIP), other personal data in connection with the settlement of e.g. civil law contracts (orders / work) 2) in the case of legal persons: name and surname, position, e-mail address, telephone number	1) in the case of natural persons: art. 6 (1) b), c), f) GDPR, 2) in the case of legal persons: art. 6 (1) c), f) GDPR,
3.	Personal data processed for contact purposes - replying to received correspondence	name, surname, telephone number, e-mail address, information provided in the content of the e-mail: position, place of work,	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
4.	Personal data processed in order to prepare and present an offer in relation to own products and services	name, surname, telephone number, e-mail address,	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
5.	Personal data processed for the purpose of sending commercial	name, surname, e-mail address,	1) art. 6 (1) a) GDPR - consent of the data subject [art. 10 Act

	information in relation to own products and services by electronic means		on the provision of electronic services], 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
6.	Personal data processed in connection with the process related to the submission of offers (in response to inquiries)	name and surname, e-mail address, telephone number, registration data of the entity (NIP, seat), other personal data provided by the applicant	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
7.	Personal data processed in connection with the recruitment process	Information on the processing of personal data is available at the link: Processing of personal data in connection with the recruitment or provision of services	Information on the processing of personal data is available at the link: Processing of personal data in connection with the recruitment or provision of services
8.	Personal data processed in connection with the data processing by the Controller based on the provision of services (civil law contracts)	Name, surname, address, telephone number, e-mail address, registered office address, tax identification number, confirmation of qualifications regarding the provision of services, other data provided in the bidding process	Information on the processing of personal data is available at the following link: Processing of personal data in connection with the recruitment or provision of services
9.	Personal data processed in connection with the exercise of rights in the field of personal data protection	The scope of data necessary to exercise the rights of the person	1) art. 6 (1) c) GDPR - legal provisions, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
10.	For other purposes - while the content of art. 13 GDPR will then be presented individually for the respective processing purpose	-	-

We hereby inform that depending on the purpose of processing, the scope of the indicated personal data may change.

How long will personal data be processed in accordance with the storage limitation principle (personal data retention)?

Please be advised that personal data are or may be processed for the period of:

No.	Purpose of processing	Lawfulness of processing	Processing period
1.	<p style="text-align: center;">NDA</p> <p>(Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))</p>	<p>1) in the case of natural persons: art. 6 (1) b), f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,</p>	<p>a) in order to prepare, conclude and implement the provisions of a confidentiality agreement (NDA) - for the duration of the preparation, conclusion and duration of the contract - for an indefinite period or until the contract is terminated or until an objection to the processing is raised, b) for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract (NDA) - if applicable - for the duration of the claims in accordance with applicable law and for the period of their investigation - if applicable, c) for internal management purposes - controlling and archiving documentation in connection with the conclusion of the contract - for a period of 10 years from the date of the contract, which may be changed,</p>
2.	<p style="text-align: center;">Arrangement</p> <p>(Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)</p>	<p>1) in the case of natural persons: art. 6 (1) b), c), f) GDPR, 2) in the case of legal persons: art. 6 (1) c), f) GDPR,</p>	<p>a) in order to prepare, conclude and implement the provisions of the contract - for the duration of the preparation, conclusion and duration of the contract - for an indefinite period or until the termination of the contract or until objections to processing are submitted, b) in order to make financial settlements - for a minimum period of 6 years from the end of the financial year, c) for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract - if applicable - for the duration of</p>

			the claims in accordance with applicable law and for the period of their investigation - if applicable, d) for internal management purposes - controlling and archiving documentation in connection with the conclusion of the contract - for a period of 10 years from the date of the contract, which may be changed,
3.	Personal data processed for contact purposes - replying to received correspondence	1) art. 6 (1)a GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	1) until the consent is withdrawn, 2) until an objection to the processing is submitted, 3) for a period of 10 years for internal administrative purposes,
4.	Personal data processed in order to prepare and present an offer in relation to own products and services	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	1) until the consent is withdrawn, 2) until an objection to the processing is submitted, 3) for a period of 10 years for internal administrative purposes,
5.	Personal data processed for the purpose of sending commercial information in relation to own products and services by electronic means	1) art. 6 (1) a) GDPR - consent of the data subject [art. 10 Act on the provision of electronic services] 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	1) until the consent is withdrawn, 2) until an objection to the processing is submitted, 3) for a period of 10 years for internal administrative purposes,
6.	Personal data processed in connection with the recruitment process	Information on the processing of personal data is available at the link: Processing of personal data in connection with the recruitment or provision of services	Information on the processing of personal data is available at the link: Processing of personal data in connection with the recruitment or provision of services
7.	Personal data processed in connection with the data processing by the Controller based on the provision of services (civil law contracts)	Name, surname, address, telephone number, e-mail address, registered office address, tax identification number, confirmation of qualifications regarding the provision of services, other data provided in the bidding process	Information on the processing of personal data is available at the following link: Processing of personal data in connection with the recruitment or provision of services

8.	Personal data processed in connection with the exercise of rights in the field of personal data protection	1) art. 6 (1) c) GDPR - legal provisions, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	1) for the period resulting from legal provisions (for an indefinite period) 2) until an objection to the processing is submitted,
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Please be advised that the given periods of personal data processing for individual processing purposes may change, among others, as a result of amendments to the law or internal organizational changes.

Under what circumstances is the provision of personal data a statutory or contractual requirement or a requirement necessary to enter into a contract?

Please be advised that providing personal data is:

No.	Purpose of processing	Lawfulness of processing	Processing
1.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: art. 6 (1) b), f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	a) processing of personal data in order to prepare, conclude and implement the provisions of a confidentiality agreement (NDA) - providing personal data is contractual, and failure to provide personal data will result in the inability to prepare, conclude and implement the provisions of the contract, b) processing of personal data for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract (NDA) - it is voluntary, and failure to provide personal data will result in the inability to pursue claims,
2.	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	1) in the case of natural persons: art. 6 (1) b), c), f) GDPR, 2) in the case of legal persons: art. 6 (1) c), f) GDPR,	a) processing of personal data in order to prepare, conclude and implement the provisions of the contract - providing personal data is contractual, and failure to provide personal data will result in the inability to prepare, conclude and

			<p>implement the provisions of the contract,</p> <p>b) in the case of financial settlements, it is of a statutory nature and failure to provide personal data will result in the inability to meet the obligations arising from the applicable law on the Controller,</p> <p>c) processing of personal data for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract - it is voluntary, and failure to provide personal data will result in the inability to pursue claims,</p>
3.	Personal data processed for contact purposes - replying to received correspondence	<p>1) art. 6 (1) a) GDPR - consent of the data subject,</p> <p>2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller</p>	<p>1) is voluntary, but failure to provide personal data will result in the inability to respond to inquiries or correspondence received,</p>
4.	Personal data processed in order to prepare and present an offer in relation to own products and services	<p>1) art. 6 (1) a) GDPR - consent of the data subject,</p> <p>2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller</p>	<p>1) is voluntary, and failure to provide personal data will result in the inability to prepare and send the offer,</p>
5.	Personal data processed for the purpose of sending commercial information in relation to own products and services by electronic means	<p>1) art. 6 (1) a) GDPR - consent of the data subject [art. 10 Act on the provision of electronic services]</p> <p>2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller</p>	<p>1) is voluntary, and failure to provide personal data will result in the inability to prepare and send commercial information,</p>
6.	Personal data processed in connection with the process related to the submission of offers (in response to inquiries)	<p>1) art. 6 (1) a) GDPR - consent of the data subject</p> <p>2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller</p>	<p>1) is voluntary, and failure to provide personal data will result in the inability to submit and consider the offer,</p>

7.	Personal data processed in connection with the recruitment process	Information on the processing of personal data is available at the link: Processing of personal data in connection with the recruitment or provision of services	Information on the processing of personal data is available at the following link: Processing of personal data in connection with the recruitment or provision of services
8.	Personal data processed in connection with the data processing by the Controller based on the provision of services (civil law contracts)	Name, surname, address, telephone number, e-mail address, registered office address, tax identification number, confirmation of qualifications regarding the provision of services, other data provided in the bidding process	Information on the processing of personal data is available at the following link: Processing of personal data in connection with the recruitment or provision of services
9.	Personal data processed in connection with the exercise of rights in the field of personal data protection	1) art. 6 (1) c) GDPR - legal provisions, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	1) is voluntary, and failure to provide personal data will result in the inability to exercise the rights of the person in the field of personal data protection, 2) is of a statutory nature, and failure to provide personal data will result in the inability to comply with the provisions of the law in the area of personal data protection imposed on the Controller,

Processing of personal data based on the consent of the data subject

Please be advised that in the case of processing personal data based on the consent of the data subject (Article 6 (1) (a) of the GDPR):

No.	Purpose of processing	Lawfulness of processing	Art. 6 (1) a) GDPR
1.	Personal data processed in order to prepare and present an offer in relation to own products and services	1) art. 6 (1) a) GDPR - consent of the data subject,	The data subject has the right to withdraw their consent at any time.
2.	Personal data processed for the purpose of sending commercial information in relation to own products and services by electronic means	1) art. 6 (1) a) GDPR - consent of the data subject [art. 10 Act on the provision of electronic services]	Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Withdrawal of the consent granted should be reported to the e-mail address:
3.	Personal data processed in connection with the process related to the submission of offers (in response to inquiries)	1) art. 6 (1) a) GDPR - consent of the data subject,	dpo@fulqrum.games

4.	Personal data processed in connection with the recruitment process	Information on the processing of personal data is available at following the link: Processing of personal data in connection with the recruitment or provision of services	Information on the processing of personal data is available at the following link: Processing of personal data in connection with the recruitment or provision of services
5.	Personal data processed in connection with the data processing by the Controller based on the provision of services (civil law contracts)	Name, surname, address, telephone number, e-mail address, registered office address, tax identification number, confirmation of qualifications regarding the provision of services, other data provided in the bidding process	Information on the processing of personal data is available at the following link: Processing of personal data in connection with the recruitment or provision of services

The processing of personal data based on the legitimate interest pursued by the Controller (processing is necessary for the purposes of the legitimate interests pursued by the controller)

Please be advised that in the case of processing personal data based on the legitimate interest pursued by the Controller (Article 6 (1) f) of the GDPR processing is necessary for the purposes of the legitimate interests pursued by the controller):

No.	Purpose of the processing	Lawfulness of the processing	Art. 6 (1) f) GDPR
1.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	Please be advised that in the case of processing personal data of natural persons and natural persons representing or acting on behalf of a legal person, the legitimate interest pursued by the Controller is considered to be: a) processing in order to prepare, conclude and implement the provisions of a confidentiality agreement (NDA), b) processing for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract (NDA) - if applicable - the legitimate interest pursued by the Controller is the processing of personal data for the purpose of seeking claims

			for the implementation of the provisions of the contract (NDA), c) processing for internal management purposes - the legitimate interest pursued by the Controller is the control and archiving of documentation in connection with the conclusion of the contract,
2.	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	Please be advised that in the case of processing personal data of natural persons, natural persons representing or acting on behalf of a legal person, the legitimate interest pursued by the Controller is considered to be: a) processing in order to prepare, conclude and implement the provisions of the contract, b) processing for the purpose of financial settlements - activities related to the monitoring and payment of payments, c) processing for purposes related to the investigation between the parties to the contract of claims arising from the performance of the provisions of the contract - if applicable - the legitimate interest pursued by the Controller is the processing of personal data for the purpose of seeking claims for the implementation of the provisions of the contract, d) processing for internal management purposes - the legitimate interest pursued by the Controller is the exercise of control and archiving of documentation in connection with the conclusion of the contract,
3.	Personal data processed for contact purposes - replying to received correspondence	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	The legitimate interest of the controller is the processing of personal data in order to answer the received correspondence, inquiries - ongoing contact with the data subject,
4.	Personal data processed in order to prepare and present an offer in relation	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the	A legally legitimate interest is considered to be a binding relationship, including a business relationship, an ongoing contract

	to own products and services	legitimate interests pursued by the controller	with the data subject and data processing for internal administrative purposes, also in relation to the exercise of the rights of data subjects in connection with the possibility of exercising the rights of persons to whom data concern and provided for by law (e.g. documenting withdrawal of granted consent),
5.	Personal data processed for the purpose of sending commercial information in relation to own products and services by electronic means	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	A legally legitimate interest is considered to be a binding relationship, including a business relationship, an ongoing contract with the data subject and data processing for internal administrative purposes, also in relation to the exercise of the rights of data subjects in connection with the possibility of exercising the rights of persons to whom data concern and provided for by law (e.g. documenting withdrawal of granted consent),
6.	Personal data processed in connection with the process related to the submission of offers (in response to inquiries)	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	A legally legitimate interest is considered to be a binding relationship, including a business relationship, an ongoing contract with the data subject and data processing for internal administrative purposes, also in relation to the exercise of the rights of data subjects in connection with the possibility of exercising the rights of persons to whom data concern and provided for by law (e.g. documenting withdrawal of granted consent),
7.	Personal data processed in connection with the exercise of rights in the field of personal data protection	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller	A legally legitimate interest is considered to be a binding relationship, including a business relationship, an ongoing contract with the data subject and data processing for internal administrative purposes, also in relation to the exercise of the rights of data subjects in connection with the possibility of exercising the rights of persons to whom data concern and provided for by law

		(e.g. documenting withdrawal of granted consent),
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Disclosure of personal data by the Controller

We hereby inform that personal data is or may be disclosed by the Controller:

- 1) **disclosed to data recipients providing services to the Controller pursuant to art. 28 GDPR** – Data Processing Agreement. Depending on the purpose of personal data processing, the categories of data recipients may be: IT infrastructure providers (software and hardware), website hosting, tools for conducting meetings, conferences, online webinar, external recruiting companies. The list of the processors to whom the Controller entrusts the processing of personal data is available at the request of the data subject,
- 2) **disclosure of data to recipients cooperating with the Controller.** Depending on the purpose of personal data processing, the categories of recipients to whom personal data may be disclosed are entities operating in the field of audits, postal services, courier services, law offices. We would like to inform you that after disclosing personal data, the data recipient becomes the Controller. The list of recipients to whom the Controller discloses personal data is available at the request of the data subject,
- 3) **disclosure of data to recipients who are public / state authorities.** Depending on the purpose of personal data processing, the categories of data recipients may be such bodies as the Tax Office, Police, courts, the Supervisory Authority or other entities to which the Controller discloses personal data under applicable law. Please be advised that after disclosing personal data, their recipient becomes the Controller of the data. The list of recipients to whom the Controller discloses personal data is available at the request of the data subject,
- 4) **disclosure of personal data to third parties.** The list of third parties to whom the Controller discloses personal data is available at the request of the data subject.

Transferring personal data to a third country (i.e. outside the EEA)

1. Please be advised that personal data may be transferred to a third country, i.e. outside the EEA. In the event of transferring personal data outside the European Economic Area, such transfer may only take place on the terms set out in Chapter V of the GDPR:
 - 1) pursuant to art. 45 GDPR - transfer based on an adequacy decision,
 - 2) pursuant to art. 46 GDPR - transfer subject to appropriate safeguards, including the use of standard data protection clauses adopted by the European Commission,
2. We hereby inform that the transfer of personal data outside the EEA may involve the risk of not ensuring sufficient security of personal data. In the event of a risk related to the transfer of personal data outside the EEA, the Controller provides such information in this Privacy Policy,

3. Please be advised that the list of entities outside the EEA to which the Controller discloses personal data is available at the request of the data subject,
4. List of entities that may transfer personal data outside the EEA, which may not provide sufficient protection of personal data provided for in the GDPR:

No.	The name of the entity	Link to information	The risk related to the transfer of data outside the EEA and the negative effects that may arise for the data subject
1.	YouTube	https://www.youtube.com/t/terms	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,

What are the rights of the data subject?

We would like to inform you about the right to request the Controller to exercise the following rights:

- 1) the right to access personal data relating to the data subject,
- 2) the right to rectify personal data,
- 3) the right to delete personal data (erasure of personal data),
- 4) the right to limit the processing of personal data (restriction of processing),
- 5) the right to object to the processing,
- 6) the right to transfer data (the right to data portability),
- 7) the right to receive a copy of your personal data,
- 8) the right to lodge a complaint with the supervisory body (<https://uodo.gov.pl/en>).

Please be advised that due to the individual purposes of processing listed in this Cookie Policy, the exercise of the rights of data subjects may be fully or partially limited, e.g. due to applicable law, which obliges the Controller to process them.

Who is the supervisory authority?

We would like to inform you about the right to lodge a complaint to the supervisory body, i.e. to the President of the Personal Data Protection Office (UODO) with its seat at 2 Stawki Street in Warsaw, <https://uodo.gov.pl/en>.

What is the source of the data?

Personal data may:

- 1) come directly from the data subject,
- 2) come indirectly from the data subject. The source of personal data may be publicly available registers, e.g. KRS, CEIDG. Personal data may come from a legal entity that provides personal data of persons designated on behalf of the legal entity to represent it or to contact it, or to implement the provisions concluded between the parties.

What scope of personal data is processed?

The Controller processes personal data to the extent necessary to achieve the purposes of processing indicated in the Privacy Policy. In accordance with the principle of minimization, we process only the scope of personal data necessary to achieve the purpose of processing.

How do we secure personal data?

Please be advised that in order to protect privacy and personal data, the Controller has implemented appropriate physical, technical, organizational and legal measures to ensure the security of personal data processing and to ensure the implementation of the rights and freedoms of natural persons.

References to other sites

1. Please be advised that the website of the Controller may contain references to other websites (e.g. business partners cooperating with the Controller).
2. Please be advised that the Controller is not responsible for the processing of personal data of other websites. Information on the processing of personal data is made available by the Controllers to which the abovementioned websites belong.

Personal data breach notifications

We hereby inform that pursuant to Art. 34 GDPR, in the event of a breach of personal data protection that may result in a high risk of violation of the rights or freedoms of natural persons, the Controller shall notify the data subject of such a personal data breach without undue delay. Please be advised that pursuant to Art. 34 GDPR, personal data may be processed in connection with the personal data breach referred to above. Please be noted that the legal basis for the processing of personal data is art. 6 sec. 1 lit. c) GDPR. Please be advised that in the event of a personal data breach, the Controller will take all possible and available technical and organizational measures to meet the requirements set out in art. 33 and art. 34 GDPR.

Processing of personal data in connection with the recruitment or provision of services

Information on the processing of personal data in the recruitment process based on the Labor Code

Pursuant to Art. 13 of the GDPR (<https://uodo.gov.pl/pl/404/224>), we would like to inform you that:

1. The Data Controller in relation to persons applying for employment is Fulqrum Games S.A., 02-255 Warszawa, 36 Krakowiaków Street, KRS: 0000660225.
2. Contact details to the Controller:
 - a) e-mail: dpo@fulqrum.games
 - b) or by traditional mail to the above-mentioned address.
3. Please be advised that the Data Protection Officer has not been appointed.
4. Please be advised that in the case of selected recruitment processes, there may be joint controllership of personal data (Article 26 of the GDPR). In the event of the joint controllership process, information on joint controllership will be provided to the data subject in a separate communication.
5. Please be advised that personal data is or may be processed for the following purposes:
 - a) in order to carry out the recruitment process - the legal basis for the processing of personal data is the Act of June 26, 1974, the Labor Code, art. 22'1 (Article 6 (1) (c) of the GDPR). Please be noted that providing personal data is statutory and results from art. 22'1 of the Labor Code (Journal of Laws 1974 No. 24 item 141 (as amended), the Act of June 26, 1974. Labor Code: <http://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19740240141>). Please be advised that failure to provide personal data will result in the inability to participate in the recruitment process,
 - b) in order to verify the professional qualifications indicated by the participant in the recruitment process (if applicable) - the legal basis for the processing of personal data is the Act of June 26, 1974, the Labor Code, art. 22'1 (Article 6 (1) (c) of the GDPR). Please be advised that providing personal data is statutory and results from art. 22'1 of the Labor Code (Journal of Laws 1974 No. 24 item 141 (as amended), the Act of June 26, 1974, the Labor Code). Please be advised that failure to provide personal data will result in the inability to verify professional qualifications and thus the inability to participate in the recruitment process. Please be advised that the verification of professional qualifications may be preceded by the submission by the person applying for employment of a declaration of confidentiality of all information provided - the legal basis for the processing of personal data is art. 6 (1) f) GDPR - legitimate interest pursued by the Controller. Please be advised that the legitimate interest pursued by the Controller is to ensure confidentiality and secrecy in relation to the information provided. Please be advised that failure to provide personal data will result in the inability to submit a confidentiality statement and thus, the inability to verify the professional qualifications of the person applying for employment,
 - c) in connection with the processing of personal data in future recruitment processes conducted by the Controller. If you agree to participate in future recruitments

conducted by the Controller, please include the following clause in the application documents:

"I consent to the processing of my personal data contained in the application documents for future recruitment processes planned by the Controller."

6. Please be advised that the legal basis for the processing of personal data is the consent of the data subject for the processing of his personal data in the recruitment processes planned by the Controller (Article 6 (1) (a) of the GDPR). Please be informed that the consent is voluntary, and the consent may be withdrawn at any time, without affecting other provisions resulting from participation in the recruitment process. In the event of withdrawal of the consent, personal data will not be taken into account in future recruitments conducted by the Controller. Please be advised that refusing to consent to participation in the future recruitment process will result in the inability to participate in the future recruitment process.
7. Please be noted that the scope of personal data processed in the recruitment process results from art. 22'1 § 1 of the Labor Code. Pursuant to Art. 22'1 § 1, the employer requires the applicant to provide personal data, including:
 - a) first name (names) and surname,
 - b) date of birth,
 - c) contact details (indicated by the person taking part in the recruitment),
 - d) education,
 - e) professional qualifications,
 - f) the course of previous employment.The employer requests personal data in the scope of: name (s) and surname, date of birth, contact details indicated by such person, education or other personal data in this particular category of personal data - when it is necessary to perform a specific type of work or in a specific position or when it results from applicable law. The additional scope of personal data that may be processed by the Controller (if applicable), may involve the verification of professional qualifications and may relate to ordinary data in the scope of: user ID (e.g. computer IP) and the result of the conducted verification professional.
8. If it has not been indicated in the content of the recruitment advertisement, we ask persons interested in participating in the recruitment process not to provide a specific category of personal data in the content of the application documents. Pursuant to Art. 9 GDPR, the following personal data (sensitive data) are: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sexuality or sexual orientation and information indicated in art. 10 GDPR, i.e. information on criminal convictions and offenses or related security measures.
9. A person applying for employment may, on their own initiative, provide the employer with a wider range of data than it results from Art. 22'1 § 1 of the Labor Code, including:
 - a) ordinary data, e.g. image captured in a photo or other information,
 - b) sensitive data (of a special category of personal data) indicated in art. 9 or article. 10 GDPR (special categories of personal data / sensitive data are: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic

data, biometric data, data concerning health, sexuality or sexual orientation and information concerning criminal convictions and offenses or related security measures). The processing of a specific category of personal data provided at the initiative of the job applicant is based on Art. 9 (2) a) GDPR - explicit consent. If a specific category of personal data is transferred to the employer, please include the following clause in the application documents:

"In connection with participation in the recruitment process, I consent to the processing of a specific category of my personal data contained and provided by me in the application documents."

Please be advised that if you provide a specific category of personal data without the abovementioned consent clause for their processing, the data will be anonymized (deleted). Please be advised that the consent is voluntary, and the consent may be withdrawn at any time, without affecting other provisions resulting from the recruitment process,

- c) data provided by the applicant in the form of a link or links to information about themselves (including links to social media or dedicated websites) – in that case the provision of personal data to a greater extent is considered as a voluntary consent for their processing by the job applicant.
10. We would like to inform you that in the case that a person applying for employment provides personal data on his / her own initiative to a greater extent than specified in art. 22'1 of the Labor Code, consent to their processing may be withdrawn at any time without negative effect for the current or future recruitment process.
11. Please be advised that personal data is or may be disclosed to recipients of personal data:
- a) state authorities only under applicable law - if applicable,
 - b) recipients of the data based on art. 28 GDPR - entrusting the processing of personal data. The categories of recipients to whom personal data are disclosed are: external entities providing recruitment services in the form of dedicated recruitment applications or ICT solutions, external companies dealing with the recruitment process at the request of the Controller, other entities providing services supporting the recruitment process conducted by the Controller,
 - c) The Controller, at the request of the data subject, provides a list of all entities to whom personal data is disclosed in the recruitment process.
12. Please be advised that personal data are or may be transferred to a third country (i.e. outside the European Economic Area). In the case of transfer of personal data outside the EEA, the provisions of Chapter V of the GDPR shall apply:
- a) transfer on the basis of an adequacy decision by the European Commission (Article 45 of the GDPR),
 - b) transfer, subject to appropriate safeguards, of standard data protection clauses adopted by the European Commission (Article 46 (2) (c) of the GDPR)
- At the request of the data subject, the Controller provides a list of entities outside the EEA to which personal data is disclosed - if applicable.
13. Please be advised that personal data is or may be processed:

- a) for the period specified for the candidates to send application documents - in accordance with the date indicated in the job advertisement or until their withdrawal from participation in the recruitment process or their withdrawal of the consent,
 - b) in order to conduct ongoing recruitment after receiving applications from candidates - for a period not longer than 6 months from the end of the application period or until the withdrawal from participation in the recruitment process or the withdrawal of the consent,
 - c) for the purpose of processing personal data in connection with future recruitment - for no longer than 12 months from the end of the recruitment process or until the consent granted for the processing of personal data in future recruitment is withdrawn.
14. The Controller informs that the abovementioned period of personal data processing may change depending on the circumstances that may result in the need of change of the abovementioned period. In the event of a change in the abovementioned period of personal data processing, the Controller will inform the candidates participating in the recruitment process about such a change.
15. We would like to inform you about the right to request the Controller to exercise the following rights:
- a) the right to access personal data relating to the data subject,
 - b) the right to rectify personal data,
 - c) the right to delete personal data,
 - d) the right to limit the processing of personal data,
 - e) the right to object to the processing,
 - f) the right to transfer data,
 - g) the right to receive a copy of your personal data.
- Please be advised that due to the individual purposes of processing, listed above, the exercise of the rights of data subjects may be fully or partially limited, e.g. due to applicable law, which obliges the Controller to their processing.
16. We would like to inform you about the right to lodge a complaint with the supervisory body, ie the President of the Personal Data Protection Office in Warsaw. Contact details of the supervisory body: Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw or via the contact details available on the authority's website: <https://uodo.gov.pl/pl/p/kontakt>.
17. Please be advised that personal data processed in connection with recruitment or future recruitment are not subject to profiling, automated profiling or automated decision making, including profiling.
18. Please be advised that the Controller does not plan any other purpose for the processing of personal data than the one indicated above. In the event of other purposes, the Controller will inform about these purposes in a separate communication.
19. Please be advised that in order to protect privacy and personal data, the Controller has implemented appropriate technical and organizational measures to ensure the security of personal data processing.
20. Please be advised that the recruitment process may be based on:
- a) personal data coming directly from the data subject - provided in the content of the application documents,
 - b) personal data coming indirectly from the data subject (from other sources). In the case of obtaining personal data from sources other than directly from the person applying

for employment, the Controller, in accordance with art. 14 (3) GDPR, informs the data subject about the processing of his personal data within a reasonable time after obtaining the personal data - no later than within one month, and if the personal data are to be used for communication with the data subject - at the latest - at the first such communication with the person the data subject. Please be advised that another source from which the candidate's personal data may come may be external recruitment agencies cooperating with the Controller, which disclosed the candidates' personal data to the Controller.

Information on the processing of personal data in connection with the provision of services to the Controller based on civil law contracts

Pursuant to Art. 13 of the GDPR (<https://uodo.gov.pl/pl/404/224>), we would like to inform you that:

1. The Controller in relation to persons applying for employment is Fulqrum Games S.A., 02-255 Warszawa, 36 Krakowiaków Street, KRS: 0000660225,
2. Contact details to the Data Controller:
 - a) e-mail: dpo@fulqrum.games
 - b) or by traditional mail to the above-mentioned address.
3. Please be advised that the Data Protection Officer has not been appointed.
4. Please be advised that in the case of selected recruitment processes, there may be joint controllership of personal data (Article 26 of the GDPR). In the event of the joint controllership process, information on joint controllership will be provided to the data subject in a separate communication.
5. Please be advised that personal data is or may be processed for the following purposes:
 - a) **in connection with the Controller receiving information about an offer regarding provision of services to the Controller on the basis of civil law contracts** - the legal basis for the processing of personal data is art. 6 (1) a) GDPR - consent of the data subject. Please be advised that the processing of personal data is voluntary and that you have the right to withdraw your consent at any time. Please be advised that failure to provide personal data or withdrawal of consent will result in the inability to participate in the bidding process regarding provision of services to the Controller on the basis of civil law contracts,
 - b) **in order to verify the professional qualifications indicated by the participant in the bidding process (if applicable), including:**
 - **submitting a declaration of confidentiality of all provided information** - the legal basis for the processing of personal data is art. 6 (1) f) GDPR - legitimate interest pursued by the Controller. The legitimate interest pursued by the Controller is considered to be confidentiality and secrecy in relation to the provided information. Please be advised that providing personal data is voluntary, and failure to provide personal data will result in the inability to submit a confidentiality declaration and thus the inability to participate in the bidding process regarding the provision of services to the Controller on the basis of civil law contracts,

- **verification of professional qualifications in connection with the submission of an offer regarding the provision of services to the Controller on the basis of civil law contracts**, the legal basis for the processing of personal data is art. 6 (1) f) GDPR - legitimate interest pursued by the Controller. Please be advised that the legitimate interest pursued by the Controller is the verification of the professional qualifications of the person participating in the bidding process. Please be advised that providing personal data is voluntary, and failure to provide personal data will result in the inability to verify professional qualifications and thus the inability to participate in the bidding process regarding the provision of services to the Controller on the basis of civil law contracts,
 - c) in connection with the preparation, conclusion and implementation of provisions resulting from the cooperation agreement concluded between the parties - the legal basis for the processing of personal data is art. 6 sec. 1 lit. b) - processing is necessary for the conclusion and implementation of the contract and art. 6 (1) c) GDPR - processing is necessary in order to fulfill the obligations imposed on the Controller under applicable law. Please be advised that providing personal data is of a contractual and statutory nature, and failure to provide personal data will result in the inability to prepare, conclude and implement the provisions of the contract concluded between the parties.
6. Please be advised that personal data may be processed based on the legitimate interest pursued by the Controller (Article 6 (1) (f) of the GDPR), i.e. for purposes related to:
 - a) claims that may arise between the parties for failure to maintain confidentiality and secrecy in relation to the provided information,
 - b) for archival and statistical purposes necessary to manage the bidding process and perform contracts in relation to the services provided to the Controller on the basis of civil law contracts.
 7. Please be advised that personal data may be disclosed:
 - a) recipients of data pursuant to art. 28 GDPR - entrusting the processing of personal data. Please be noted that the categories of recipients may be entities providing IT, accounting and tax, legal and other services, supporting the organizational processes of the Controller. The list of processing entities entrusted by the Controller with the processing of personal data is available at the request of the data subject,
 - b) recipients of personal data are or may be public and state authorities to which the Controller is obliged to disclose personal data on the basis of currently applicable legal provisions (eg the Tax Office, Social Insurance Institution). The list of entities to which personal data is disclosed is available at the request of the data subject,
 - c) recipients of personal data are or may be entities to which personal data is disclosed in order to implement the provisions of the contract, and which, after their disclosure, become separate Controllers. The categories of such entities are Poczta Polska (Polish Post), couriers, bank, law firm. The list of entities to which personal data is disclosed is available at the request of the data subject.
 8. We would like to inform you about the right to request the Controller to exercise the following rights:
 - a) the right to access personal data relating to the data subject,
 - b) the right to rectify personal data,
 - c) the right to delete personal data,
 - d) the right to limit the processing of personal data,

- e) the right to object to the processing,
- f) the right to transfer data,
- g) the right to receive a copy of your personal data.

Please be advised that due to the individual purposes of processing, listed above, the exercise of the rights of data subjects may be fully or partially limited, e.g. due to applicable law, which obliges the Controller to process them.

9. We would like to inform you about the right to lodge a complaint with the supervisory body, i.e. the President of the Personal Data Protection Office (UODO) with its seat at 2 Stawki Street in Warsaw, <https://uodo.gov.pl/pl>, <https://uodo.gov.pl/pl/83/155>.
10. Please be advised that personal data are or may be processed for the period of:
 - a) in connection with the Controller receiving the information about the offer regarding the provision of services to the Controller on the basis of civil law contracts - for the duration of the bidding process and for a period of 10 years after the end of the bidding period,
 - b) in order to verify the professional qualifications indicated by the participant in the bidding process (if applicable), including:
 - submitting a declaration of confidentiality of all provided information - for an indefinite period,
 - verification of professional qualifications in connection with the submission of an offer regarding the provision of services to the Controller on the basis of civil law contracts - for the period of providing the Controller with given services, for a minimum period of 10 years from the end of providing the Controller with the given services, for a minimum 3 years after the end of the bidding process for the provision of services to the Controller,
 - c) in order to prepare, conclude and implement the provisions of the concluded contract - for the duration of the preparation, conclusion and validity of the contract, for a minimum period of 10 years from the completion of the contract,
 - d) for purposes that claims may arise between the parties (if applicable) - for a period of 3 years from the end of the bidding process or from the end of the provision of the services to the Controller,
 - e) for internal purposes (management, archival) - for a period of 10 from the end of the passing of the resolution or from the moment of completing the provision of services to the Controller.
11. Please be advised that personal data are or may be transferred to a third country (i.e. outside the European Economic Area). In the case of transfer of personal data outside the EEA, the provisions of Chapter V of the GDPR shall apply:
 - a) transfer on the basis of an adequacy decision by the European Commission (Article 45 of the GDPR),
 - b) transfer, subject to appropriate safeguards, of standard data protection clauses adopted by the European Commission (Article 46 (2) (c) of the GDPR).At the request of the data subject, the Controller provides a list of entities outside the EEA to which personal data is disclosed - if applicable.
12. Please be informed that personal data processed in connection with the offer is not subject to profiling, automated profiling or automated decision making, including profiling.

13. Please be advised that the Controller does not plan any other purpose of personal data processing than the one indicated above. In the event of other purposes, the Controller will inform about these purposes in a separate communication.
14. Please be noted that in order to protect privacy and personal data, the Controller has implemented appropriate technical and organizational measures to ensure the security of personal data processing.
15. Please be advised that in the case of sole proprietorship, personal data may be obtained from publicly available registers (CEIDG) in order to verify the person before concluding a cooperation agreement.
16. Please be informed that the category of relevant personal data are: natural persons who are a party to the contract in connection with the preparation and conclusion of a cooperation agreement with persons conducting sole proprietorship.

Information for persons providing personal data to the Controller outside the recruitment or bidding process

We would like to inform that in the case of sending to the Controller an application or offers containing personal data at the time when the Controller does not conduct and does not plan to conduct the recruitment or bidding process:

- a) received applications or offers are immediately deleted by the Controller,
- b) if the following clause is included in the application documents, personal data will be processed for a period not longer than 12 months from receipt of the application documents or until the consent is withdrawn or an objection to the processing of personal data is raised. In this case, please include the following clause in the content of the application documents in the recruitment process based on the Labor Code:

"I consent to the processing of my personal data contained in the application documents for future recruitment processes planned by the Controller."