**PRIVACY POLICY**

**§1**

**General provisions**

1. This website (reef-technologies.com) is using cookies and similar technologies concerning user’s data. Due to the protection of the privacy of the users using the website www.reef-technologies.com, belonging to the company under the name Reef Technologies sp. z o.o. with it’s registered seat in Warsaw at ul. Puławska 39 lok. 40

(02-508 Warsaw), holding VAT ID: PL5213951727, entered into the register of entrepreneurs maintained by the District Court for the capital city of Warsaw in Warsaw, XIII Economic Division of National Court Register under the name KRS: 0000943523, REGON: 520944840, share capital: 5.000 PLN a Privacy Policy is introduced as follows.

1. Terms used in the following Privacy Policy are used with the following meanings:
	1. **Policy** - refers to the following Privacy Policy;
	2. **Controller** – the company established under the Polish law under the name Reef Technologies sp. z o.o. with it’s registered seat in Warsaw at ul. Puławska 39 lok. 40 (02-508 Warsaw), holding VAT ID: PL5213951727, entered into the register of entrepreneurs maintained by the District Court for the capital city of Warsaw in Warsaw, XIII Economic Division of National Court Register under the name KRS: 0000943523, REGON: 520944840, share capital: 5.000 PLN
	3. **Website** - refers to the website managed by the Controller available under the following address: www.reef-technologies.com;
	4. **Customer** - a natural person, a legal person, or an organizational unit with no legal personality but with legal capacity, using the Website;
	5. **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 (General Data Protection Regulation);
	6. **APSEM** - the Act on Provision of Services by Electronic Means of July 18, 2002 (Journal of Laws of 2017, item 1219).
2. This Policy contains information about the processing of personal data in connection with Customers' use of the Website.
3. The Controller processes the personal data of the Customers of the Website in compliance with the GDPR and other currently applicable legal provisions on personal data protection. The Controller shall apply proper precautionary measures, including technical and organizational measures to ensure the security of the processed personal data, appropriate to the threats and the category of data which is to be processed, and in particular, they shall protect the data from disclosure to unauthorized persons, from being taken by an unauthorized person, from being processed in violation of the GDPR or other relevant legal provisions, and from being altered, lost, damaged or destroyed.
4. The Controller conducts their activity in consistency with industry standards to protect the confidentiality of Customers' personal information. The Controller has implemented reasonable organizational, technical, and physical controls to protect personal information from loss, misuse, or alteration.
5. The provisions of this Policy apply to all persons using the functionalities of the Website available at www.reef-technologies.com.

**§2.**

**The scope, purpose, and period of processing of Customers' personal data**

1. Personal data of the Website Customers is processed by the Controller:
	1. with the purpose of providing services by electronic means within the scope of providing Customers with access to the contents of the Website (i.e. processing is necessary for the performance of a contract (Article 6(1)(b) GDPR),
	2. in relation to the performance of a recruitment services (Article 6(1)(b) GDPR),
	3. the processing of data may prove necessary for purposes other than those indicated above and which are indispensable in connection with the performance of financial and tax settlement obligations (Article 6(1)(c) GDPR),
	4. In some cases it is or it may become necessary to process the indicated data for purposes other than those indicated above, as a result of the Controller’s legitimate interests (Article 6(1)(f) GDPR), i.e. handling complaints or claims,
	5. for statistical purposes (Article 6(1)(f) GDPR),
	6. in other cases, personal data will be processed only on the basis of previously granted consent, to the extent and for the purpose specified in the content of the consent (Article 6(1)(a) GDPR).

**Contact form**

1. The Controller provides a contact form in the Website to enable the Customer to contact them.
2. In order to use the contact form, the Customer is required to provide their:
	1. first name,
	2. email address,
	3. subject and content of the message to the Controller.
3. The basis for the processing of the personal data provided in the contact form referred to above is the consent to the processing of personal data (Article 6(1)(a) of GDPR) or the necessity to take action at the request of the data subject (Article 6(1)(a) of GDPR).
4. Providing personal data is voluntary, but necessary in order for the Controller to respond to the Customer’s inquiry. Provision of the data indicated as mandatory is required for the purpose of handling the query and will facilitate the Controller’s contact with the Customer. Failure to provide the data indicated as mandatory will prevent the Controller from handling the query.
5. The Customer's personal data will be processed for no longer than it is necessary to respond or until their consent is withdrawn.

**Recruitment**

1. The Controller provides a career site within the Website to enable the Customers to contact with the aim to apply for various positions in the Controller’s enterprise.
2. In order to file a job application, the Customer is required to provide their personal data such as IP address, other data identifying the Customer’s device or the Customer. The Controller uses fingerprinting process to evaluate the applications.
3. The basis for the processing of the personal data provided in the career site referred to above is the consent to the processing of personal data (Article 6(1)(a) of GDPR) or the necessity to take action at the request of the data subject (Article 6(1)(a) of GDPR).
4. Providing personal data is voluntary, but necessary in order for the Controller to proceed the Customer’s job application. Provision of the data indicated above is required for the purpose of handling the application and will facilitate the Controller’s contact with the Customer. Failure to provide (as well as lack of consent for provision) the data indicated above will prevent the Controller from handling or receiving the application.
5. The Customer's personal data will be processed for no longer than it is necessary to proceed its application or until their consent is withdrawn.

**§3**

**The rights of the data subjects**

1. Customers of the Website, in relation to the processing of their personal data by the Controller, have the following rights under the provisions of GDPR:
	1. the right to access the content of the provided personal data,
	2. the right to request completion, update, the rectification of provided personal data, temporary or permanent suspension of its processing,
	3. the right to erasure of the data provided if it is incomplete, outdated, untrue, or collected in violation of GDPR, or if it is no longer necessary for the purpose for which it was collected,
	4. the right to be forgotten,
	5. the right to have the processing of the personal data provided restricted,
	6. the right to portability of the personal data provided, if the data is processed in an automated way on the basis of the consent or on the basis of a contract,
	7. the right to object to the processing,
	8. the right not to be a subject to profiling,
	9. the right to withdraw consent to the processing of the personal data provided at any time, if the processing of such data is based on consent,
	10. the right to file a complaint to the supervisory authority; the supervisory authority with jurisdiction over the Controller with regard to personal data is the Chairman of the Office for Personal Data Protection.
2. In case of any questions concerning personal data processing and exercising one's rights, the Website's Customer can contact the Controller at any time:
	1. by e-mail: hello@reef.pl

**§4**

**Sharing and entrusting of the personal data**

1. The Customer's personal data will not be made available by the Controller to other entities, with the exception of a situation in which the Controller makes the Customer's personal data available on the basis of commissioned services and in accordance with concluded personal data processing agreements.
2. Entities to which the data is entrusted are obliged to use appropriate technical and organizational measures to secure the personal data of the Customers.

**§5**

**Cookie files**

1. The Controller uses cookies, which are small text files stored on the Customer's device. Cookies can be read by the Controller's IT system. By means of the IT system, the Controller gains access to the information contained in cookie files.
2. The Controller stores cookie files on the device for the following purposes:
	1. adapting of the offered services to the User’s preferences,
	2. purposes connected with the application evaluation process;
	3. statistical purposes.
3. The Controller also informs the Customers of the Website that it is possible to configure the Internet browser in order to prevent the storage of cookies on the Customer's end device.
4. Cookies can be deleted by the Customer after they are stored by the Controller, by using appropriate functions of the browser, programs designed for this purpose, or by using appropriate tools available for this purpose within the operating system used by the User.

**§6**

**Final Provisions**

1. This Policy may be reviewed on an ongoing basis and amended as necessary.
2. The current version of the Policy is effective as of 1st December 2023.