

Privacy Policy

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Version: 1.0

This Privacy Policy (hereinafter as “Privacy Policy”) describes the way TALENTWAY.NET, s.r.o., seated Vajnorská 1306/7, 831 03 Bratislava, Company ID: 51 775 891, registered with the Slovak Commercial Register of District Court Bratislava I, Insert No.129330/B (further as “TalentWay”) collect, process and protect your personal data. TalentWay hereby undertakes to protect your personal data in accordance with the applicable legal regulations in the area of data protection, such as 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 (“GDPR”).

This Privacy Policy applies to the processing of personal data on all services, applications, and websites operated or provided by TalentWay, in which personal data is processed and in which this Privacy Policy is contained or referenced. This Privacy Policy also applies to processing personal data of website visitors, service users, and also representatives of our business partners or individuals that contact us via our website. This Privacy Policy also applies to cases where TalentWay processes personal data as a controller.

In case of any discrepancy between this Privacy Policy and the specific privacy policy applicable to any product or service provided by TalentWay, the specific privacy policy shall prevail.

The provisions of this Privacy Policy shall apply from the effective date stated above. TalentWay may from time to time change and update this Privacy Policy. If we update this Privacy Policy, an updated version shall be published on our website and/or at other places we deem appropriate. We may, but are not obligated to, send you an email or other notice of this change, but you should check this Privacy Policy from time to time for any significant changes to the text of this Privacy Policy.

1. How does TalentWay work?

TalentWay operates TalentWay platform (“TalentWay”). The main purpose of TalentWay is to provide an online work environment for project-based learning and dual learning - to connect students with lecturers and experts from practice. The secondary mission of the platform is to record and archive learning outcomes - assessments, reports, and certificates and to maintain a personal profile for the purpose of generating CVs of high school and university students.

The tertiary aim of the platform for students and graduates is to obtain interesting and suitable job offers from companies and organizations, mainly on the basis of the assessment of practical skills that students continuously acquire in their CVs from project-based learning or dual training.

Platform functions are divided into the following areas and with these participants:

a) education - student, lecturer, expert

- primarily intended for project-based learning at high schools and universities,
- also used for dual education with the participation of companies,
- promotes teamwork of students,
- creates an online connection between students, lecturers and experts from practice.

b) recording the process and the progress of education - student, lecturer, expert

- Continuous and final assessment of the project results
- OCTO assessment of four abilities of students - Objectives (analytical skills), Complexity (creative skills,), Team Work (teamworking skills), Outputs (presentation skills).

c) Generation of CVs - student

- from the completed personal profile of the student,
- from the results of project learning and dual education,
- from the personal storage of reports and certificates on the platform,
- from the student's photo uploaded to the platform.

d) job offers from companies - student, HR employee

- automatic (anonymous) selection of suitable job applicants according to the selection criteria set by the company at the platform,
- anonymous sending of job offers from the company's subpage by automatic email to the addresses of suitable candidates from the portal via call@talentway.net,
- making the blind CV of a suitable candidate available to the company after confirmation of his/her consent to apply for the job,
- making the proper CV with personal data available to the company after confirmation of the applicant's interest in the position and payment of the fee.

2. Personal data we process

When you create an account with TalentWay, visit our website, sign up for a newsletter and we may process the following categories of personal data about you:

- identification data: name, surname, date of birth,
- contact data: address, telephone number, email,
- data necessary for CV creation: previous working experience (position, employer name, length of employment), data about achieved education (school name, proof of achieved education),
- data about the company where you currently work and what is your current position,
- results of your OCTO assessment,
- your gender, photography, and data revealing your racial or ethnic origin,
- payment data,
- any further information you decide to share with us.

The actual scope of information that we process about you may differ based on your interactions with TalentWay, or what interface of TalentWay you use.

When you attend a presentation, other event organized by TalentWay or contact us through our customer support, we may process the following data about you:

- identification data: name, surname,
- contact data: address, telephone number, email,
- any further information that you decide to share with us during the recruitment process.

When you apply for a job at TalentWay we can process the following categories of personal data about you:

- identification data: name, surname,
- contact data: email, address, telephone number,
- information contained on your CV,
- any further information you provide us with.

3. How do we process your personal data?

When you create an account on TalentWay's website, we process personal data necessary for the creation of your user profile (such as name, surname, email, gender, etc.). Three types of natural persons may create a profile with TalentWay:

- high school and university students - older than 16 years,
- high school and university lectures,
- company and organisation workers as experts or HR workers.

Natural persons input their personal data directly to the registration form available during registration, alternatively later by completing their profile or by filling another form available on the website. By using services of TalentWay you enter into contractual relationships with TalentWay. Legal basis for the processing of such data is the performance of contract or precontractual relations in the meaning of the article 6 (1) b) GDPR.

TalentWay may use your personal data for marketing purposes, if you sign up for our newsletter or other marketing communications. These communications shall strictly adhere to applicable legal regulations. Advertising and marketing communication shall be send to you only if you opted in to receive such communications or you have not refused its sending. Legal basis for processing of your personal data for marketing purposes is your consent in the meaning of the article 6 (1) a) GDPR. In case of personalised marketing communication, the legal basis is your explicit consent under the article 9 (2) a) GDPR.

You can withdraw your consent to receive marketing communication at any time, by unsubscribing at the footer of each email. You can also opt out from such communications by contacting TalentWay directly at dpo@talentway.net. If you choose to unsubscribe, TalentWay will only retain data necessary for providing our services to you in accordance with the rules as set out in this Privacy Policy.

In some instances, legal regulations impose obligation on us under which we are obliged to process your personal data, such cases are for instance tax laws, or AML laws, accounting laws and laws on the provision of some data to public authorities.

If you reach out to us in connection with the any open job position at TalentWay and you will take part in the recruitment process, in such cases we process your personal data on the legal basis contractual or precontractual relations under the article 6 (1) b) GDPR.

4. Data retention

Generally your personal data, shall be kept for as long as necessary for the purpose for which it was processed. Period for which your personal data will be processed by TalentWay depends on the legal basis on which they are processed. If the processing is based on the legitimate interest, your personal data shall be processed for as long as the given legitimate interest is in place. Where we process personal data on the basis of legal obligations, the data retention period is prescribed by the applicable laws. For the personal data processed on the legal basis of performance of a contract, the personal data is processed for the duration of contract and the applicable limitation period. Where the processing is based on your consent, your personal data will be deleted after you withdraw your consent. You can withdraw your consent to personal data processing at any time at dpo@talentway.net. Please bear in mind, that your personal data may be processed despite your consent withdrawal, as your personal data may be processed on several legal basis. In such cases deletion request might not mean a full erasure of your personal data. The withdrawal of consent does not affect the lawfulness of the processing of personal data prior to consent withdrawal.

TalentWay will not collect unproportionate amounts of personal data, or other information, that is not necessary for the purposes on which are your personal data processed.

When you create an account with TalentWay, your personal data will be processed for the length of your registration. You can ask for the profile deletion at any time.

5. Use of cookies

We use cookies on our website in order to make the most of the website features and to fit the website to your preferences. Cookies are small encrypted text files that that are stored on your computer or other device. Cookies help us to run our website and also to understand how you use it. The cookies we collect are essential and analytical:

- **Essential cookies:** are used to maintain the basic functionalities and to improve the user experience, e.g. we store the completed data in the forms. This data are stored in your browser, i.e. we do not have access to such data.
- **Analytical cookies:** are used for the tracking of your movements on the website, they also help us to analyse what content is relevant for you. We also collect analytical cookies in order to improve your user experience.

The collection of essential and analytical cookies takes place from your first visit of TalentWay, about which we inform you via a cookie banner located at the bottom of the

website. This banner allows you to manage what cookies we may use. You can change your preference settings and withdraw your consent to the use of cookies at any time.

What can we learn through cookies?

- anonymous collection of information about how visitors and users use subpages, such as which subpages are visited most often, how much time a visitor spends browsing the site, etc.
- anonymous collection of technical information about the device from which the sub-page is visited, such as information about the type and version of browser, type and version of operating system, type and version of device from which the page is visited, etc.

When we store data or access data stored on your device, such as your computer or mobile phone, for analytical, functional or advertising purposes, we do so only with your consent under the article 6 (1) a) GDPR.

When collecting the essential cookies, the legal basis for the processing of such data is legitimate interest within the meaning of Article 6 (1) f) GDPR. These cookies cannot be disabled through your privacy settings as our website may not function properly if you disable this type of cookie, however, if you still wish to do so, you can follow the instructions below under Disabling cookies.

Disabling cookies

If you do not wish cookies to be collected, you may restrict, block or delete the cookies at browser, whom which you visit our website. However, by doing so, you lose, for example, the ability to save pre-populated data in forms or some of the other features of the site.

If you wish to prevent new cookies from being installed or if you wish to delete existing cookies you can find the instructions on the links below. The exact procedure depends on which browser you are using:

- Firefox: [TU a TU](#)
- Google chrome: [TU](#)
- Safari: [TU](#)

6. Data sharing and data transfers to third countries

Your personal data will not be shared with the third parties, except in the following situations:

- data transfer is necessary for the provision of TalentWay services,
- based on your consent,
- entrusting of personal data to processors who process personal data on behalf of TalentWay,
- TalentWay is obliged to provide the personal data on the basis of law or upon order by a public authority.

Sub-processors

TalentWay use the services of the trusted third party service providers (furthermore as “sub-processors”), that helps us to provide our services. These sub-processors process personal data based on the instructions provided by TalentWay. We use the following categories of sub-processors:

- hosting,
- analytical and marketing tools,
- IT tools,
- our contractors and other partners that helps us to provide our services.

Transfer to third countries

In some cases TalentWay may transfer your personal data outside the EU/EEA. Such transfer may take place only if it is in accordance with GDPR. That means that our provider is seated in a country for which the European Commission issued a decision that it provides an adequate level of personal data protection (adequacy decision), standard contractual clauses (“SCCs”) issues by the European Commission, or other transfer mechanisms are in place that ensure adequate safeguards with respect to the protection of personal data.

You have right to request a copy of SCCs, that we entered into with our sub-processors seated outside the EU/EEA and that are used for the transfers of personal data outside the EU/EEA. If you wish to obtain the copy of these SCCs, please contact us at dpo@talentway.net.

7. Protecting and securing your personal data

TalentWay undertakes to ensure that your data are securely stored. TalentWay therefore introduced adequate technical and organisational measures in order to ensure the safety of your personal data, including:

- encrypting data,
- use of passwords and other barriers when accessing user data (multiple levels of system logs, strong password policy).
- establishment of sufficient physical barriers for access to areas where data is stored (access control),
- automated and manual QA tests,
- two-factor authentication when signing into the development environment.

These measures do not deprive you of your duties to undertake proper steps in order to secure your own personal data. You should, inter alia, regularly change your passwords. On the other hand you should not use predictable usernames and/or passwords, share your passwords with others or provide access to your user account. TalentWay will never ask you for your password in any unsolicited communications. Please notify us immediately upon any unauthorized use of your user account or any other suspected breach of security.

8. Your rights

Under GDPR you are entitled to following rights:

Right of access

You have the right to obtain confirmation from us regarding the information whenever we process your personal data. If you wish to obtain such information, please contact us at dpo@talentway.net. If we process your personal data, we will provide you with the following information

- purposes of processing,
- the categories of personal data obtained,
- the recipients, or categories of recipients of personal data,
- if possible, the period for which your personal data will be retained, or at least the criteria that determine that period,
- the existence of the right to ask the controller to rectify or erase the personal data or to restrict the processing of personal data concerning the data subject or to object to such processing,
- right to file a complaint with supervisory authority
- the sources of your personal data, if such personal data have not been obtained directly from you
- the details of the existence of automated decision-making, including profiling.

Right to rectification

You have the right for any of your incomplete, inaccurate, or out-of-date personal data to be rectified.

Right to erasure

You are entitled to the erasure of certain personal data without undue delay. Please be aware that TalentWay may be entitled or even obliged to keep some of your personal data despite your data deletion request. These are mainly situations where we need to process your personal data in order to comply with our legal obligations or to defend our legal claims.

Right to restriction of processing

In the cases such as:

- if you object the accuracy of personal data, for a period that allows us to verify the accuracy of personal data,
- the processing is illegal and you do not agree to the deletion of your personal data and request the restriction of their use,
- We no longer need your data for processing purposes, but your personal data is necessary to prove, exercise or defend legal claims,
- you have objected to processing in relation to profiling until it is verified that our legitimate grounds outweigh yours,

You can ask TalentWay to restrict the processing of your personal data.

Right to data portability

You are entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format and ask from us to transmit that data to another controller, if it is technically possible. We would like to warn you that this right apply only to the data that you have provided us with and which we process as a controller based on your consent or contract.

Right to object

You are entitled to object, on grounds relating to your particular situation, at any time to the processing of personal data that concerns you and is carried out in the public interest or for the purposes of legitimate interests pursued by TalentWay, including profiling.

The exercise of your rights may be limited shall TalentWay be obliged to keep any of your personal data for the purpose of compliance with legal obligations, for the establishment, exercise or defence of legal claims or any other compelling reasons as provided by the relevant data protection law.

Right to not be subject to automated decision making

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision:

- is necessary for entering into, or performance of, a contract between you and TalentWay
- is authorized by law and the law lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

TalentWay does not make decisions based solely on automated processing that would have significant effects for TalentWay user. For completeness, TalentWay uses cookies and similar technologies the use of which may amount to profiling. For information on how to withdraw your consent for the use of cookies or disable cookies, please see chapter 5. Cookies of this Privacy Policy.

Right to file a complaint

If you feel that TalentWay process your personal data unlawfully, please contact us and we will try to resolve this situation. Under GDPR you are entitled to file a complaint with the Office for Personal Data Protection, seated Hraničná 4826/12, 820 07 Ružinov.

9. Children privacy

Our websites, services and applications are not designed for individuals younger than sixteen (16) years of age. If you are younger than sixteen (16) years of age please refrain from providing personal data to TalentWay. We do not intentionally collect personal data from individuals younger than sixteen years of age on our website. Users that have not reached sixteen (16) years of age () should refrain from using Talentway's websites, services and applications without the consent of parent or legal guardian.

10. Contact information

If you have any questions regarding the safety of your personal data, please do not hesitate and contact us directly at dpo@talentway.net or by the mail to the address: Talentway.net, s.r.o., DPO, Vajnorská 7, 831 03 Bratislava.