
Privacy Policy
Kaizen Legal Solutions Dąg Drózdź spółka komandytowa based in Warsaw

I. DEFINITIONS:

Policy or Privacy Policy	this Privacy Policy available at www.kaizensolutions.pl ;
The Company or Data Controller	Kaizen Legal Solutions Dąg Drózdź spółka komandytowa based in Warsaw at: ul. Ząbkowska 31, 03-736 Warszawa, entered into the Register of Entrepreneurs of the National Court Register (KRS) kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Economic Department of the National Court Register under the KRS No. 0000942030, NIP (Tax ID): 1133047886, REGON (Business ID): 520809839;
Website	the website created by the Company accessible at www.kaizensolutions.pl ;
Personal Information	Personal Information within the meaning of the General Data Protection Regulation (GDPR), i.e. any information relating to an identified or identifiable natural person;
User	any natural person, legal entity or organisational unit without legal personality who visits the Website;
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 Information and on the free movement of such data and repealing Directive 95/46/EC (the General Data Protection Regulation, GDPR).

II. GENERAL PROVISIONS:

1. This Privacy Policy governs the processing of Personal Information of the Website at: www.kaizensolutions.pl.
2. Any User of the Website browsing its content in the publicly accessible area of the Website may provide information concerning him or her, either personally identifiable information (including Personal Information) and anonymous information. The Data Controller makes every effort to ensure the confidentiality, integrity and security of the data provided by the User, and to protect such data from third party access without an explicit legal basis. With regard to the processing of Personal Information, the Data Controller shall comply in particular with the principles set forth in the GDPR.
3. In matters related to the protection of Personal Information, you can contact the Data Controller:
 - a. in writing, to the following address: Kaizen Legal Solutions based in Warsaw, ul. Ząbkowska 31, 03-736 Warszawa;
 - b. by email: kancelaria@kaizensolutions.pl;
 - c. by phone: +48 /22/ 243 33 18.

4. This Policy is intended to inform you about how the Company, as the Data Controller, uses Personal Information, what information about you is collected and used or transferred to third parties or processed in other ways.
5. This Policy applies only to the Website operated by the Company and does not apply to online services offered by third parties.
6. The Personal Information provided using the forms available on the Website are treated as confidential and are not accessible to unauthorised parties.

III. COLLECTION OF PERSONAL INFORMATION BY THE DATA CONTROLLER:

1. The Data Controller collects the Users' personal data, including their Personal Information, for specific, clearly defined and legitimate purposes and will not treat them in any manner that does not conform to those purposes. Whenever it is necessary to collect information for a specific purpose, the Data Controller will notify the person concerned in an effort to provide the full information statement regarding data processing at the time of or, if possible, before the collection of such data.
2. The Data Controller is committed to collecting only the data that is adequate and relevant, and do not extend beyond the purpose for which they are being collected.
3. Through the Website, the Data Controller may gain information:
 - a. provided directly by Users, including:
 - i. information of persons contacting the Data Controller using the Data Controller's contact information available on the Website or using the contact form,
 - ii. information of persons who provide their data for recruitment purposes (via the "Careers" tab);
 - b. collected automatically:
 - i. for reasons of data security and in order to improve the user experience of the Website, the Data Controller may also collect data such as the Internet browser and the operating system used, the domain name of the website visited directly before entering the Website, the number of visits and the time spent on the Website, and the specific subpages visited by the User;
 - ii. the information collected automatically are not linked to data from other sources; The Data Controller shall take all necessary measures to ensure that the data collected automatically referred to above is not personally identifiable, i.e. that it does fall into the category of Personal Information; However, in justified cases the Data Controller reserves the right to retrospectively verify the data collected automatically and to take all necessary measures within the limits prescribed by the law to determine the source of the data – in particular in the event of evidence of illegal use of the Website.

IV. RULES OF PERSONAL INFORMATION PROCESSING

1. The Data Controller processes Personal Information:
 - a. in accordance with data protection regulations, in particular the GDPR,
 - b. in accordance with this Policy.
2. The categories, legal grounds and period of processing of Personal Information are determined separately for each purpose of processing, according to the principles described in this section.
3. The Data Controller shall process the following categories of Personal Information:
 - a. Personal Information provided for recruitment purposes (via the "Careers" tab) – the legal basis for the processing of personal data in this case is Article 6(1)(b) of the GDPR, which means that the processing is necessary to take action at the request of the Data Subject prior to entering into a contract, namely to conduct the recruitment procedure;
 - b. Personal Information of persons contacting the Data Controller using the Data Controller's contact information available on the Website, the contact form, Personal Information of Users visiting the Data Controller's social media profiles (LinkedIn) – the legal basis for the processing of Personal Information in this case is Article 6(1)(f) of the GDPR, which means that the processing is necessary for

the purposes of the legitimate interests pursued by the Data Controller, which include consideration of individual cases submitted by the Users, which includes responding to a forwarded inquiry, notifying Users of the Data Controller's actions, and promoting various events, services and products of the Data Controller on social media;

- c. Personal Information provided for the purpose of provision of electronic services with regard to providing Users with access to content collected on the Website – the legal basis for this type of processing is the necessity of processing information for the performance of the contract (Article 6(1)(b) of the GDPR);
4. Personal Information may also be processed on the basis of:
 - a. Article 6(1)(f) of the GDPR, which provides that the processing is necessary for the purposes of legitimate interests pursued by the Data Controller or a third party, which may include determining, investigating and defending against claims, investigating complaints regarding services offered by the Data Controller, processing Personal Information of individuals provided by the Data Controller's contracting parties intended for the performance of a contract entered into between the contracting party and the Data Controller;
 - b. Article 6(1)(a) GDPR – with respect to Personal Information provided by Users on an optional basis, other than those required for the specific purpose of processing:
 - with the consent of Users, including Personal Information provided in recruitment documents (CV, cover letter, etc.), beyond the scope required by law or beyond the scope necessary for the Data Controller to carry out recruitment procedure for a specific position (if provided), and Personal Information processed for future recruitment purposes (if consent was given);
 - with the Users' consent, for the purpose of sending commercial information, so that the Data Controller can prepare an offer in response to inquiries sent using the contact form or contact information provided on the Website.
5. As a rule, the provision of Personal Information is voluntary, but necessary to fulfil the purpose for which they are provided. The consequences of failure to provide data may be:
 - a. for the information specified in Section 3(a) – inability to participate in the recruitment procedure;
 - b. for the information specified in paragraph 3(b) – inability to receive feedback from the Company or consideration of the individual case submitted by the User.

In the case of Personal Information provided on an optional basis (with consent), there are no consequences of not providing such information.
6. Personal Information may be received by, in particular, Personal Information Processors acting on behalf of the Data Controller, including IT and hosting service providers, providers of telecommunications marketing services, delivery services, providers of accounting services, providers of consulting services, including legal, tax and other services, and contracting parties of the Data Controller. Personal Information processed for recruitment purposes may also be shared with recruitment intermediaries and recruitment support providers, including recruitment and training companies.
7. Personal Information may be processed, respectively, for the time necessary to process an individual case submitted by the User using the contact information or using the contact form available on the Website and afterwards, i.e. for the period of time required by applicable laws, including in connection with the document retention requirements, such as tax documents, or until the expiry of the statute of limitations, whichever of these is longer. In the case of data processed for the purpose of conducting the recruitment procedure, Personal Information may be processed for the duration of the current recruitment, whereas in respect of future recruitments (if consent has been given) – for a further period of 3 years from the time of consenting, unless it is revoked earlier.
8. Users have the following rights in connection with the processing of their Personal Information:
 - a. the right of access Personal Information;
 - b. the right to rectify Personal Information,
 - c. the right to erase Personal Information (the right to be forgotten);
 - d. the right to restrict the processing of Personal Information.

9. In the case of Personal Information specified in Sections 3(b) and 4(a) (in particular the legitimate interest), Users have the right to object to the processing of Personal Information.
10. In the case of Personal Information specified in Section 3(a) (recruitment procedure) and Section 4(b) (data provided voluntarily with consent), Users also have the right to data portability, if the processing is carried out in an automated manner.
11. In the case of the Personal Information specified in Section 4(b), Users also have the right to withdraw their consent at any time without affecting the legality of the processing performed before the withdrawal.
12. To exercise the rights referred to in Sections 8–11 above, the User may submit an appropriate request to the Data Controller using the contact information listed in Section II(3) of this Policy.
13. Users have the right to submit a complaint to the supervisory authority, i.e. the President of the Office for Personal Information Protection (address: ul. Stawki 2, 00-193 Warszawa).
14. No decisions will be made in relation to the Personal Information provided in an automated manner, which includes profiling.

V. COOKIES:

1. The Website uses cookies. They are small text files sent by the web server and stored by the browser's computer software. When the Website is revisited by the browser, the Website recognises the User's device. The parameters of the stored information can be read only by the server that created the information. Therefore, cookies make it easier to use previously visited websites.
2. The information collected includes the IP address, the browser used, the language, the operating system, the Internet service provider, time and date, location, and information submitted to the Website using the contact form.
3. Cookies identify the User, which enables the Website content to be tailored to their needs.
4. The following cookies are used by the Website:
 - a) necessary cookies enabling the use of services accessible on the Website;
 - b) performance cookies that enable us to collect information on the usage of the Website;
 - c) functional cookies that enable us to store the User's settings and personalize the user interface, such as the User's language or regional settings, font size, appearance of the Website etc.
5. The information is used to monitor and analyse how Users use the Website in order to improve the Website by providing a more efficient and seamless User experience. We monitor user information using the Google Analytics, which records user behaviour on the Website.
6. Users have the option to disable cookies in their browser at any time, if they do not want the files to be stored on their computers or other devices. Cookies can be turned off permanently or for the duration of the current session.

VI. FINAL PROVISIONS

1. The Company reserves the right to amend this Policy. Any changes to the Policy take effect on the date specified by the Company, but not less than 7 days from the date they are published on the Website.
2. The Data Controller shall make all commercially reasonable efforts to provide Users with a high level of security while using the Website.
3. The Data Controller reserves the right to disclose selected information with regard to the User to competent authorities or third parties who submit a request for such information on the appropriate legal basis and in accordance with the provisions of applicable law.
4. Using the Website means that you agree to the terms of this Policy.