

Job Applicants (Recruitment)

This notice is addressed to individuals participating in recruitment processes conducted by eTravel S.A.

1. Data Controller

Controller	eTravel S.A., Al. Jerozolimskie 96, 00-807 Warsaw, Poland
Contact	Tel. +48 22 492 08 60, e-mail: sekretariat@etravel.pl
Data Protection Officer (DPO)	Contact the DPO at: rodo@etravel.pl

2. Categories of Personal Data We Process

We process the data you provide during the recruitment process, including:

- identity and contact data: name, surname, e-mail address, phone number, residential address
- professional data: career history, qualifications, education, language skills, experience, references
- other data voluntarily provided in your CV or during a recruitment interview

Please do not provide us with special category data (e.g. relating to health, religion or political affiliation) unless required by law. Polish Labour Code provisions define a closed list of data we may request from candidates. We collect only data that is necessary to assess your application.

3. Purposes and Legal Bases for Processing

Purpose	Legal basis (GDPR)
Conducting the recruitment process for a specific position – verifying and assessing the application	Art. 6(1)(b) – pre-contractual steps at the request of the data subject; Art. 6(1)(c) – legal obligation (Polish Labour Code, Art. 22 ¹)
Conducting future recruitment processes (talent pool) – only with the applicant's separate consent	Art. 6(1)(a) – consent (separate and voluntary)
Defending against potential claims arising from the recruitment process	Art. 6(1)(f) – legitimate interests of the controller

Providing data covered by Art. 22¹ of the Labour Code is voluntary but necessary to participate in the recruitment process. Providing data beyond that scope (e.g. for inclusion in a talent pool) is voluntary and requires your separate consent.

4. Recipients of Your Data

Your data may be shared with:

- applicant tracking system (ATS) providers – under data processing agreements
- external recruitment agencies cooperating with eTravel S.A. (where the recruitment is conducted in cooperation with an agency)
- public administration authorities – as required by law

5. Retention Period

- data of candidates participating in the current recruitment: for the duration of the recruitment process and up to

3 months after its conclusion (potential limitation period for equal treatment claims)

- data of candidates who consented to future recruitment: for 12 months from the date of consent or until consent is withdrawn

6. Your Rights

- right of access to data (Art. 15 GDPR)
- right to rectification (Art. 16 GDPR)
- right to erasure (Art. 17 GDPR)
- right to restriction of processing (Art. 18 GDPR)
- right to object to processing based on legitimate interests (Art. 21 GDPR)
- right to withdraw consent at any time – without affecting the lawfulness of processing before withdrawal
- right to lodge a complaint with the President of the Personal Data Protection Office (UODO)

Contact: rodo@etravel.pl or in writing to the registered address of eTravel S.A.

Final Notes – Legal Information

1. Legal Basis of This Document

This document fulfils information obligations arising from:

- Art. 13 GDPR – where data is collected directly from the data subject
- Art. 14 GDPR – where data is collected from another person or entity (e.g. the traveller's employer, the client company)
- Art. 12 GDPR – requirement for transparency and intelligibility of information

2. Updates to This Document

eTravel S.A. reserves the right to update this document in the event of changes to its data processing activities, changes in applicable law or guidance issued by supervisory authorities. The current version is always available at: etravel.pl/en/rodo. We will communicate material changes in a manner appropriate for each category of data subjects (e.g. by e-mail for CTA users, by a notice on our website for others).

3. Contact and Exercising Your Rights

E-mail (recommended)	rodo@etravel.pl
Phone	+48 22 492 08 05
Postal address	Data Protection Officer, eTravel S.A., Al. Jerozolimskie 96, 00-807 Warsaw, Poland
Response time	No later than 30 days of receiving a request (Art. 12 GDPR); in complex cases the period may be extended by a further 2 months
Supervisory authority	President of the Personal Data Protection Office (UODO), ul. Stawki 2, 00-193 Warsaw, Poland, tel. +48 606 950 000, www.uodo.gov.pl

Document prepared in accordance with Regulation (EU) 2016/679 (GDPR) | Version: 2026 | eTravel S.A.