

Privacy notice of XTB

A. Data Controller

The Data Controller of Your personal data is XTB S.A with its registered office in Warsaw (address: ul. Prosta 67, 00-838 Warsaw).

You can contact with XTB via:

1. e-mail: office@xtb.com,
2. phone: (+48 22 2019560),
3. letter: ul. Prosta 67, 00-838 Warsaw.

B. Data Protection Officer

We would like to inform you that we have appointed a Data Protection Officer, whom you can contact on all matters related to the processing of personal data by e-mail: iod@xtb.com or by post to the registered office address with the note "DPO".

C. Purpose of processing

We would like to inform You, that Your personal data will be processed on the legal basis of the Regulation of the European Parliament and of the Council (EU) 2016/679 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 the repeal of Directive 95/46 / WE (hereinafter as „GDPR”)

In the case of employment under an employment contract:

- a. We process the personal data specified in the Labour Code, in particular sections 1 and 2 of Article 221 of the Labour Code (including the first name and surname, date of birth, contact details, education, professional experience) for the purpose of complying with XTB's legal obligation (Article 6(1)(c) GDPR).
- b. If the application contains any information other than the data specified by the Labour Code or other provisions of the law (for example a photograph or information about hobbies), then we process such personal data on the basis of consent (Article 6 (1)(a) GDPR). In accordance with the information included in the application, this consent is given by the data subject by providing such additional personal data in the data subject's application and clicking 'Apply Now' (Aplikuj teraz – Pracuj.pl) or 'Send' (Wyślij – eRecruiter's additional application form) or submitting the application to us in any other way.

In the case of employment under a civil law contract:

- c. We process personal data to the extent necessary to conclude a contract (Article 6(1)(b) of the GDPR);
- d. If the application contains any information other than necessary to conclude a contract (for example a photograph or information about hobbies), then we process such personal data on the basis of consent (Article 6 (1)(a) GDPR). In accordance with the information included in the application, this consent is given by the data subject by providing such additional personal data in the data subject's application and clicking 'Apply Now' (Aplikuj teraz – Pracuj.pl) or 'Send' (Wyślij – eRecruiter's additional application form) or submitting the application to us in any other way.

Notwithstanding the above, personal data obtained as part of recruitment may be processed:

- e. We process the data for the purposes of future recruitment on the basis of consent (Article 6(1)(a) GDPR) given by the data subject by ticking the specific box under the application form in eRecruiter, or in such other way as we may specify for a given recruitment process (e.g. by including in the CV the consent clause we have indicated).
- f. In the event of any controversies between the data subject and XTB in connection with the recruitment process, XTB processes the personal data on the basis of its legitimate interest

consisting in the pursuit or defence of claims before courts or state authorities (Article 6(1)(f) GDPR).

D. Source of Data

Your personal data may originate from XTB's third-party service providers in the area of recruitment support or the handling of recruitment processes. Such entities are, in principle, separate controllers of your personal data and submit candidates' personal data to XTB on the basis of a separate agreement. On your request, XTB will provide you with information on whether your personal data were acquired from a third party.

E. Recipients of Data

- a. **Collaborating entities** - We may share your personal data with cooperating entities, i.e. companies that XTB owns or controls or that are under common control with XTB or are in constant cooperation with XTB. These are in particular banks, investment companies, auditors, companies providing other financial services, IT companies, consulting companies or courier companies), only to the extent necessary to implement such cooperation;
- b. **Processing entities** - We transfer your personal data to entities providing services and processing on behalf of XTB, i.e. providers of IT services and solutions

The processing of data by XTB may require the transfer of personal data to entities providing services to XTB in other countries, including countries outside the European Economic Area. In the event of transfer to countries that do not ensure an adequate level of protection of personal data, XTB applies security measures in the form of one of the legal instruments provided for in the GDPR, such as, among others: decisions of the European Commission confirming an adequate level of protection in one of the third countries, standard contractual clauses approved by the European Commission or the supervisory authority of one of the Member States, approved codes of conduct in a given industry or binding corporate rules.

F. Retention

Your personal data will be processed for the purposes of carrying out the recruitment process for the following periods:

- a. for the position recruited for – the duration necessary in order to complete the recruitment process and select the candidate, and for six months following the submission of the application, in the event we need to repeat the recruitment process for some reason;
- b. b) for other positions with XTB – 12 months following the submission of the application to XTB if you consent to the processing of your personal data for future recruitment.

G. Automated decision making and profiling

We may use artificial intelligence (AI) tools to support parts of the hiring process, such as reviewing applications, analyzing resumes, or assessing responses. These tools assist our recruitment team but do not replace human judgment. Final hiring decisions are ultimately made by humans. If you would like more information about how your data is processed, please contact us.

H. Your Rights

- a. **The right to access** personal data processed by XTB (Article 15 of GDPR);
- b. **The right to rectify** entrusted personal data, including its correction (Article 16 of GDPR);
- c. **The right to erase** personal data from XTB systems, the so-called "right to be forgotten" (Article 17 of GDPR);
- d. **The right to restrict processing** of personal data (Article 18 of GDPR);
- e. **The right to data portability** (Article 20 of GDPR);
- f. **Right to object** to processing of personal data (Article 21 of GDPR);

- g. **withdrawal of consent**, with no impact on the lawfulness of the processing on the basis of such consent prior to such withdrawal;
- h. If in Your opinion the processing of personal data violates the provisions of GDPR, You have the right to lodge a complaint to the supervisory body, i.e. the President of the Office for Personal Data Protection.

I. Requirement to provide data

Providing personal data is voluntary, but failure to provide them will result in the inability to be included in the recruitment process.