

# POLAND 2.0 SUMMIT PRIVACY POLICY

## INTRODUCTION

Welcome to the Poland 2.0 Summit's privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and during the course of Poland 2.0 Summit conference (the "**Conference**").

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. *IMPORTANT INFORMATION AND WHO WE ARE*

2. HOW IS YOUR PERSONAL DATA COLLECTED

2. *THE DATA WE COLLECT ABOUT YOU*

4. *HOW WE USE YOUR PERSONAL DATA*

5. *DISCLOSURES OF YOUR PERSONAL DATA*

6. *DATA SECURITY*

7. *DATA RETENTION*

8. *YOUR LEGAL RIGHTS*

9. *GLOSSARY*

### 1. **IMPORTANT INFORMATION AND WHO WE ARE**

#### **CONTROLLER**

Poland 2.0 Summit is the controller and responsible for your personal data ("**we**", "**us**" or "**our**" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

#### **CONTACT DETAILS**

If you have any questions about this privacy policy or our privacy practices, please contact us at [privacy@poland20.com](mailto:privacy@poland20.com).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 24 September 2018.

Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## 2. HOW IS YOUR PERSONAL DATA COLLECTED

This privacy policy aims to give you information on how Poland 2.0 Summit collects and processes your personal data, including any data you may provide to us:

- 1) when you register to the Conference through our ticket service provider Ticketbase ([www.ticketbase.com](http://www.ticketbase.com)) or, in case of a group ticket when someone is buying the ticket on your behalf, through the Conference or our Poland 2.0 Registration Form;

During the registration process, we ask you to provide certain information about yourself such as **name, university/organisation, professional field of interest etc.** The purposes for which we collect this data are twofold:

- to be able to identify you as a registered Conference participant and prepare an ID card for you to use during the Conference;
- to improve our understanding of the Conference participants, that is for statistical purposes. When we use the data for statistical purposes, we will anonymise it first. We will not use the data for any other purposes; and
- for direct marketing purposes to keep you updated about our future events and ticket promotions (only with your consent);

If you are buying a ticket for yourself only, you will be asked to fill in a registration form during the payment process through Ticketbase and we will then access the data you have provided for the purposes stated above. In case of group purchases, the person buying the tickets will be asked to fill in the Ticketbase form, whereas the rest of the members of the group will need to register by filling in our Poland 2.0 Registration Form. Again, we will process the data for the purposes identified above only.

2) when you send us your CV;

As part of our culture and efforts to connect Polish students studying all over the world with the best Polish companies, we offer to put your **CV** forward to our selected partners who then may choose to contact you, if they have a relevant employment opportunity for you. To get the process started, all you need to do is:

- send us your CV to [cv@poland20.com](mailto:cv@poland20.com);
- give us your consent for data processing purposes.

We will keep your CVs in a database for a period of 6 months after the close of the Conference. We expect that this is a time when our partners are most likely to be recruiting for positions relevant to you.

You can view a list of our sponsors on our [website](#) or ask us to send you one by contacting us at [privacy@poland20.com](mailto:privacy@poland20.com).

Do not worry, we will keep your data safe. Only a very small number of our team members (at the moment it is two) will have access to the CV database and [cv@poland20.com](mailto:cv@poland20.com). Other than our sponsors, we will not share your CV with any other third parties and for any other purpose than a recruitment opportunity. Although we made it clear to our sponsors that your CV is only to be used for the purpose for which you have given your express consent, we recommend that you familiarise yourself with a privacy policy of each sponsor as we are not responsible for actions on behalf of our sponsors.

We will also require you to send us your CV when you register to one of our optional events.

Ways in which you can give us your consent.

- A. When you fill in a Poland 2.0 Summit Conference Registration Form - we will ask you to tick a consent box;
- B. When you fill in a Poland 2.0 Summit Optional Events Registration Form - we will ask you to tick a consent box;
- C. When you send us your CV directly – please add the following text to your covering email:

'I consent to the processing of my personal data contained within the attached CV for the recruitment purposes in accordance with the Poland 2.0 Summit Privacy Policy, as updated from time to time.'

3) when you sign up to Poland 2.0 optional events;

Our optional events may include activities such as workshops or lunch with a speaker.

You may be asked to register your interest in the events through a Poland 2.0 Registration Form. Apart from a simple verification reasons, this is because the number of spaces for these events are limited and following an allocation process enables us to ensure that everyone is best suited to the activities available and therefore allow you to make the best out of the Conference experience.

Personal data you will be asked to provide:

- Registration: We would only ask that you provide us with **basic information** such as your **full name** for verification purposes and your **preference**, if we offer more than one option for each event.

- Allocation: You may additionally be asked to also provide a **short explanation for your preferences** and we will also ask that you send us your **up-to-date CV**. We will then use both (we may also use some of your registration details) for allocation purposes.

Please note that where we require your up-to-date CV, we will be unable to register you to the optional event(s) without your consent to process your personal data.

- 4) when you reach out to us with a query on social media or otherwise;

We may use other data available to us at the time for verification purposes and to help answer your query.

- 5) through feedback forms distributed during or after the Conference; and

We will always ask for your consent before we use anything you have provided in the feedback form publicly, for example, when we wish to publish your opinion of the Conference on our social media. If we use any of the information for statistical purposes, it will always be anonymised.

- 6) when you take part in our competitions.

We are keen to interact with our social media followers. We want to reward them with additional benefits and therefore we have a few competitions taking place on our social media platforms. However, for certain competitions, where we feel that the participants may need a more private space to express themselves, we may choose to direct them to an online form. In this case, we will ask each participant to provide their **full name** and **email address** (in addition to their competition submission) so that we are able to contact them back.

### OUR MOBILE APPLICATION

This year, we are introducing a mobile application, which is a convenient venue to keep up to date with any updates regarding the Conference. The mobile application has an option to display your conference ticket on the screen of your mobile – very convenient!

In order to display the ticket, the application may ask you to provide your email address used for registration and verify your ticket ID. We will not store any of the data you provide for this purpose.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows (with examples of data most likely collected by us listed in the brackets to help you understand what each category means):

- Identity Data (first name, last name, title, age and gender);
- Contact Data (email address);
- Transaction Data includes (ticket ID);
- CV Data (includes data you provided on your CV);

- Profile Data (university you attend, company you work for, year of study, dietary requirements and preferences);
- Marketing and Communications Data (your preferences relating to direct marketing).

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Profile Data to calculate the percentage of participants who study at a particular university. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, you may not be able to sign up to one of our workshops). We will always notify you if this is the case at the time.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests.
- Where we need to comply with a legal obligation.

See Glossary below to find out more about the types of lawful basis that we will rely on to process your personal data.

We will obtain your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent at any time by contacting us. We will not carry out any of the activities for which we rely on your consent and which we have not obtained.

### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you to the event	(a) Identity (b) Transaction	Performance of a contract with you
To give you an opportunity to display ticket ID and contact details in the ticket section of the mobile application (if you choose to store and display a ticket on your phone, for your own convenience)	(c) Identity (d) Transaction	Performance of a contract with you
To use data for analysis relating to our participants' demographics and consequently to better understand participant base and improve the quality of future events	(a) Identity (b) Profile (c) Marketing and Communications	Necessary for our legitimate interests (to define types of Conference participants, to inform our sponsorship strategy and marketing strategy)
To notify you about changes to our terms or privacy policy.	(a) Identity (b) Contact	Necessary to comply with a legal obligation
For the purposes of direct marketing, to keep you updated about future events and promotions.	(a) Marketing and Communications	Consent
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how participants view our event and develop future events accordingly)
To share your CV with our selected partners to provide you with recruitment potential and enable you to participate in our optional conference activities (such as workshops and lunch with the speakers)	CV data	(a) Performance of a contract with you (b) Consent

## OPTING OUT

You can ask us to stop making your CV available to our sponsors or cease any marketing communication at any time by contacting us at [privacy@poland20.com](mailto:privacy@poland20.com).

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the following external parties:

### Technical infrastructure

Our technical infrastructure is provided by DigitalOcean, LLC, a cloud infrastructure provider. All data processing related to the website and functionality of the smartphone application is carried out on a Virtual Private Server ("VPS") based in London, United Kingdom. Ticket purchasing, delivery and management is handled by Ticketbase. The smartphone application interacts with Ticketbase's infrastructure, where the VPS serves as the intermediary data processor, during the process of downloading an electronic copy of the ticket. No personal information is stored permanently on the Conference's VPS.

### Our sponsors

Please see above.

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We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and the purposes for which we process your personal data.

Other than:

- data which we are required to keep by law;
- data which will be anonymised (so that it can no longer be associated with you); and
- your CV (see above)

we will delete all data collected by way of Google forms or otherwise within one month from the date of the Conference.

In addition, in some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, namely:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us at [privacy@poland20.com](mailto:privacy@poland20.com).

### NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.



## WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

### LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### YOUR LEGAL RIGHTS

You have the right to:

- A. Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- B. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- C. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able

to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- D. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- E. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- F. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- G. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.