

PRIVACY STATEMENT

This privacy statement describes how SOC360 collects and uses personal data, and describes the rights you have with respect to your personal data.

SOC360 Sp. z o.o. processes personal data for a variety of purposes. We collect personal data directly from customers and suppliers, from users visiting our website, persons with whom we communicate by phone, and job applicants who send us their applications. Finally, we obtain personal data via publicly available sources, such as LinkedIn. This privacy statement is intended to cover all of the above scenarios.

Detailed information on the specific purposes for which we collect personal data can be found in the section "Purposes for which we process personal data".

- Visitors to soc360.io
- Clients and suppliers
- Individuals whose personal data we obtain in connection with the provision of services to our customers
- Participants of SOC360 events
- Individuals who visit our social media sites
- Individuals who correspond with SOC360 via e-mail
- Job applicants
- Visitors to SOC360 office
- Individuals communicating with SOC360 by phone

The personal data controller (hereinafter: PDC) is SOC360 sp. z o.o. with its registered office in Warsaw, Al. Jerozolimskie 146C, 02-305 Warsaw. You can contact the PDC by sending a message to the following address: biuro@soc360.io

All information related to the processing of personal data by the PDC is provided by the Data Protection Officer Waldemar Szymański (hereinafter: DPO). The PDC can be contacted by sending an e-mail to iod@soc360.io

What data is covered?

In this privacy statement, 'personal data' means information about an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data or online identifier.

Personal data also refers to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of an individual.

Your rights in relation to your personal data

The rights of data subjects are listed below:

- The right to access your personal data held by SOC360
- The right to correct your personal data, e.g. if it is incomplete or incorrect
- The right to opt out of receiving marketing messages at any time
- The right to restrict or object to the processing of your personal data or to request the deletion of your personal data (in certain circumstances and in accordance with applicable law)
- The right to receive a copy of the personal data provided to SOC360 in a structured, commonly used and machine-readable format (also referred to as the right to data portability) (in certain circumstances and in accordance with applicable law)
- Where you have voluntarily provided your data or consented to its use, the right to withdraw your consent
- The right to lodge a complaint with a data protection supervisory authority

If you are concerned about an alleged breach of privacy or other laws by SOC360, you may contact the Data Protection Officer.

You also have the right to lodge a complaint with the data protection supervisory authority:

Prezes Urzędu Ochrony Danych Osobowych

Office ul. Stawki 2, 00-193 Warsaw

Purposes for which we process personal data

Visitors to the SOC360.io

The personal data we collect about visitors to our website falls into several different categories.

Information collected automatically

When you visit our website, we collect certain personal data automatically from your device. In particular, the data we collect automatically includes information such as your IP address, pixel ID, device type, unique device ID, browser type, operating system, broad geographic location (e.g., country or city-level location), and other technical information. We also collect information about how your device interacted with our website, including the pages accessed,

current URL, time spent on the site, and links clicked. Collecting this information allows us to better understand the visitors who come to our site, where they come from, and what content on our site is of interest to them.

We use this information for our internal analytical purposes and to improve the quality and usefulness of our website for visitors. The information is collected using cookies. Please note that if the Do Not Track setting or Global Privacy Control signal is enabled in your browser, Marketing/Targeting cookies will be disabled by default.

We use Google Analytics, which monitors user activity on the website (you can prevent this information from being collected in your cookie settings).

Information on how the provider protects your privacy can be found at

<https://policies.google.com/privacy?hl=pl>. You can also disable Google Analytics by installing a free browser add-on that blocks its operation, available at:

<https://tools.google.com/dlpage/gaoptout?hl=pl>.

Purposes of processing the personal data of visitors to our website:

- Administration and management of our website, including the purpose of confirming and authenticating visitors to prevent unauthorised access to restricted areas of our website
- To personalise and enhance your web browsing experience by displaying content (including targeted advertising) that is more likely to be relevant and interesting to you
- To analyse data about visitors to our website and information about website traffic
- To analyse data about how people move around the website
- To develop our business and services
- To provide marketing communications
- Obtaining information about visitors' use of the features available on our website
- To enable content retrieval
- To enable the effective provision of services and information to the user
- Any other purposes for which visitors have provided information to soc360

Legal basis for the processing of personal data of visitors to our website:

- The pursuit of a legitimate interest in the effective provision of information and services and the conduct of our business in an efficient and lawful manner
- Our legitimate interest in developing and improving our website and user experience
- Explicit consent of the user

Clients

When a user engages us to provide professional services, we collect and use personal data when we have a valid business reason to do so in connection to those services. As part of providing professional services to clients, SOC360 also processes personal data of individuals who are not directly our clients (e.g., employees, clients, or suppliers of our clients) if such data is entrusted to us by a client acting as a Controller (PDC).

Most of the personal data we collect and use to provide our services is provided voluntarily by our clients. For this reason, if you are a SOC360 client, it will be clear to you what personal data we collect and use. This information may include:

- Basic information such as your name, the name of the company you work for, your position and your relationship to the person concerned
- Contact details, such as postal address, e-mail address and phone numbers
- Financial information, such as payment details
- Any other personal data relating to you or third parties that you provide to us in order to receive our services

We use this information:

- To provide services to our customers
- To manage our relationships and maintain contractual relationships
- For accounting and tax purposes
- For marketing and business development purposes
- To comply with our legal and regulatory obligations
- For the purpose of establishing, exercising and enforcing rights
- For documentation and statistical purposes

Our main service and data processing category:

- Provision of security operational center services

The categories of data processed usually depend on the scope of the contract.

Legal bases for the processing of our customers' personal data:

- Performance of the contract
- Compliance with a legal or regulatory obligation
- Pursuit of a legitimate interest in the uninterrupted provision of uniform, high-quality services and ensuring the prompt payment of fees, coverage of costs and repayment of debts in relation to our services
- Pursuit of a legitimate interest in identifying any conflicts of interest or difficulties related to legislation on independent business conduct

- Pursuit of a legitimate interest in protecting SOC360 from inadvertently taking action using funds derived from criminal activity or assisting in any other activity that is dishonest or unlawful

Suppliers

We process the personal data of our suppliers (including subcontractors and persons working with our suppliers and contractors) for the purpose of managing our relationships and contracts, and receiving services and products from our suppliers.

The personal data we process is generally limited to contact details (name, company, phone number, email address and other contact details) and financial information (payment details).

Legal basis for the processing of our suppliers' personal data:

- Performance of the contract
- Compliance with a legal or regulatory obligations
- Pursuit of a legitimate interest in managing payments and fees and collecting and recovering our receivables
- Pursuit of a legitimate interest in protecting SOC360 from inadvertently undertaking activities using funds derived from criminal activity or assisting in any other activities that are dishonest or unlawful.

Individuals whose personal data we obtain in connection with the provision of services to our clients

In the context of providing professional services to clients, SOC360 also processes the personal data of individuals who are not directly our clients (e.g. employees, clients or suppliers of our clients).

Most of the personal data we collect and use to provide our services is data that our clients voluntarily provide to us (or that we collect from external sources at the request of our clients).

This information may include:

- Basic information such as your name, the name of the company you work for, your position and your relationship to the person concerned
- Contact details, such as postal address, e-mail address and phone numbers
- Financial information, such as payment details

- Any other personal data relating to you or third parties that you provide to us in order to receive our services

Legal basis for the processing of personal data:

- Performance of the contract
- Compliance with a legal or regulatory obligation
- Pursuit of a legitimate interest in the uninterrupted provision of high-quality, uniform services and ensuring the prompt payment of fees, coverage of costs and repayment of debts in relation to our services
- Pursuit of a legitimate interest in protecting SOC360 from inadvertently taking action using funds derived from its activities
criminal activity or assisting in any other activities that are dishonest or unlawful

Participants of SOC360 events

We process the personal data of participants in meetings, webinars, events and educational sessions organised by SOC360. We use the Zoho and Get Response applications to manage the participant registration process, which contain their own privacy statement statements explaining the reasons and methods of collecting and processing personal data. We encourage participants to read the privacy policies available in these applications.

As part of our event management processes, we process the following personal data:

- First and last name
- Email address
- Phone number
- Company name
- Gender
- Occupation (position)
- Event-related data, such as dietary requirements or other special requirements requirements, registration status, participant status/type, previous experience related to the event.

We do not intentionally collect sensitive data unless the data subject provides us with such information themselves.

SOC360 may take photographs and make audio and audiovisual recordings in public places and at the SOC360 office during events. We use such recordings in our marketing materials. The image and voice of event participants may be recorded. The recordings will be edited, reproduced, displayed, published or distributed.

Legal basis for the processing of personal data of event participants:

- Explicit consent of the participant
- Pursuit of a legitimate interest consisting in organising events and managing the registration process for participants in such events.
- Pursuit of our legitimate interest in providing information about SOC360, our services and the events we organise.

Individuals who visit our social media sites

SOC360 uses various social media platforms for, including but not limited to, recruitment and marketing purposes. We use social media to provide internet users with easy access to relevant information about SOC360 job offers and the opportunities to participate in events we organise, as well as to promote our services and brand.

SOC360 is responsible for the content published via social media platforms, but is not responsible for the management of such platforms (creating user statistics and cookie files). When using social media platforms, users are required to comply with the legal requirements and privacy terms imposed by the providers of such social media. Providers collect users' personal data, this includes statistical and analytical data on the use of social media platforms, including information about websites visited, likes, recent visits, and posts that have been published by the users or have attracted their interest. If the user wishes to access such data or exercise any of their other rights (such as the right to object to the processing of their data), they should contact the provider of the relevant social media platform. Some social media providers provide SOC360 with compiled data about our pages, including information about the number of likes in response to our content or the number of posts, visitors to our pages, photos downloaded by users, or clicks on links posted.

Legal basis for the processing of personal data of visitors to our social media:

- Pursuit of a legitimate interest in promoting SOC360's services and brand
- Pursuit of a legitimate interest in attracting, identifying and recruiting highly qualified employees
- Pursuit of the legitimate interest of improving the experience of visitors to our website and optimising our services

Individuals who correspond with SOC360 via e-mail

SOC360 utilises various tools to maintain the security of our IT infrastructure, including our email. Examples of such tools include:

- Systems that scan messages sent to SOC360 recipients for suspicious attachments and URLs to prevent malware attacks
- Tools that detect threats within endpoints to identify malware attacks
- Tools that block specific content or websites

When corresponding with SOC360 via email, messages received from you will be scanned using tools used by SOC360 to secure its IT infrastructure, which may lead to situations where the content of the message is read by authorised persons from SOC360 who are not the intended recipients.

Legal basis for the processing of personal data of persons corresponding with SOC360 by email:

- Pursuit of a legitimate interest in securing our IT infrastructure from unauthorised access and data leakage.
- Pursuit of a legitimate interest in analyzing e-mail traffic

Job applicants

We collect data from candidates and information about them in connection with job offers at SOC360. The data we collect about job applicants includes CVs, diplomas, certificates and other documents related to education, information about professional experience, employment information and references.

The information collected is shared with the relevant managers recruiting for the position and with those involved in the recruitment process who decide whether to invite a candidate for an interview.

Our recruitment tools and websites contain their own privacy statement explaining the reasons and methods of collecting and processing personal data. We encourage users of our recruitment tools and websites to read the privacy statement available on these websites and in these tools.

In addition, candidates who have successfully passed the recruitment process are required, after signing the contract, to submit a criminal record certificate (pl. oświadczenie o niekaralności) containing the information specified in the Act of 12 April 2018 on the rules for obtaining information on the criminal record of persons applying for employment.

SOC360 collects personal data about candidates from the following sources:

- Directly from the candidate – including information provided by the candidate when applying for the position
- Publicly available sources on the Internet – for example, if the candidate's professional profile is available on the Internet (e.g. on the website of their current employer or on a professional network such as LinkedIn)

- References – for example, based on references provided by a former employee or employer or obtained from a person indicated by the candidate as a reference

Legal basis for the processing of personal data of job applicants at SOC360:

- Explicit consent of the candidate
- Pursuit of a legitimate interest consisting in attracting, identifying and recruiting highly qualified employees
- Pursuit of a legitimate interest consisting in processing and managing job applications, including verification and selection of candidates
- Act of 12 April 2018 on the rules for obtaining information on the criminal record of job applicants

Visitors to SOC360 office

We process the personal data of persons who visit the SOC360 office. We process images of persons and applications with CCTV cameras with the purpose of recording and playing back the obtained recordings. We use CCTV monitoring where permitted by law.

CCTV images are stored securely and access to recordings is strictly limited to designated personnel. We may disclose CCTV images to the relevant authorities in justified cases, in particular to comply with legal requirements. We will also share CCTV images with our insurers for the purpose of processing an insurance claim following an incident.

CCTV recordings are deleted or automatically overwritten after no longer than 60 days. A fragment of a recording may be retained for a longer period if it constitutes evidence.

Legal basis for the processing of personal data of visitors to the SOC360 office:

- Pursuit of a legitimate interest in protecting our offices, staff, goods and confidential information
- Pursuit of a legitimate interest in the prevention and detection of crime and the establishment, investigation and defence of legal claims

Individuals communicating with SOC360 by phone

We process the personal data of individuals who contact us by phone and individuals who are contacted by phone by SOC360 representatives. The personal data we process is generally limited to contact details (name and last name, company, phone number) and any other information voluntarily provided to us by the caller.

Calls may be recorded using automatic recording tools. The recordings are protected information and are stored with appropriate security measures. The recordings are stored for a maximum period of 6 months.

Legal basis for the processing of personal data of visitors to our social media:

- Performance of the contract
- Pursuit of a legitimate interest in improving the services provided

Updating personal data

We maintain the adequacy and completeness of the personal data we store. Please, consider it important to inform us of any updates to your contact details or other personal information so that we have the most up-to-date information about you. Please contact the person you usually cooperate with SOC360. You may also contact the DPO.