

## **Privacy Policy**

Pragmatic Coders respects personal data of the *User* (every person using the Website) and fulfills conditions deriving from the law, especially from the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Pragmatic Coders ensures that its workers and subcontractors were given training in protection of personal data.

### **For what purpose does Pragmatic Coders process personal data?**

Personal data provided within the Website ([www.pragmaticcoders.com](http://www.pragmaticcoders.com)) and during contacts with Pragmatic Coders is used only to provide requested information and services, or for the recruitment purposes.

### **Who has access to the personal data of the User?**

The controller of personal data provided during using the website and contacting Pragmatic Coders is:

Pragmatic Coders sp. z o.o.  
Ul. Złoty Róg 13,  
30-095 Kraków  
KRS number 0000601571  
NIP 6772398603  
[contact@pragmaticcoders.com](mailto:contact@pragmaticcoders.com)

### **The rights of the User**

The User has the right to request from the controller access to personal data concerning him or her and to obtain information about the purposes of its processing, categories of data processed, recipients of data, storage period of data (if it is impossible to indicate the period, the User has the right to information about the criteria used to determine this period).

The user has also the right to rectify personal data if they are incorrect and the right to request supplementing incomplete personal data.

The User has the right to request the erasure of personal data without undue delay if:

- 1) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- 2) a consent to the processing of personal data has been effectively withdrawn;
- 3) the User objects to the processing of personal data for marketing purposes;
- 4) the User objects to the processing (also by profiling) of personal data, based on the legally legitimate interest pursued by Pragmatic Coders or by the third party, unless there are valid, legally justified grounds for processing of the User's personal data that override the interests, rights and freedoms of the User, or there are grounds for establishing, investigating or defending claims.

The User has the right to request restriction of processing of personal data when:

- 1) the User contests the accuracy of the personal data - for a period enabling the controller to verify the accuracy of the personal data;
- 2) the processing is, according to the User, unlawful and the User opposes the erasure of the personal data and requests the restriction of their use instead;

- 3) the controller no longer needs the personal data for the purposes of the processing, but they are required by the User for the establishment, exercise or defense of legal claims;
- 4) the User has objected to processing (pursuant to Article 21 paragraph 1) pending the verification whether the legitimate grounds of the controller override those of the User.

If the User requests restriction of processing of personal data, Pragmatic Coders will refrain from processing it without the consent of the User, except for storing it or processing it in order to establish, exercise or defend claims, protect the rights of another natural or legal person, or due to important reasons of public interest of the Union or a Member State. The User will be informed about this before the restriction of processing is lifted.

The User has the right to object in case of processing of the personal data for the purposes of direct marketing, including profiling, to the extent that it is related to such direct marketing. After submitting the objection, Pragmatic Coders will refrain from processing the personal data of the User for direct marketing purposes (including profiling). The User has the right to submit objections by automated means using technical specifications.

The User has the right to receive in a structured, commonly used and machine-readable format, the personal data that the User has provided to Pragmatic Coders, as well as the right to transfer his or her personal data to another controller without interference on Pragmatic Coders 's part, if:

- 1) processing takes place on the basis of the User's consent or a contract, which performance needs processing of data; and
- 2) the processing is carried out by automated means.

Pragmatic Coders is obliged to send the User's data directly to another controller (if it is technically possible) at the User's request.

The user has the right to withdraw the consent to the processing of personal data at any time, but the withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

With regard to the processing of the personal data, the User has the right to lodge a complaint to the President of the office for the protection of personal data.

### **What personal data does Pragmatic Coders collect?**

- Data provided during contact with Pragmatic Coders (most often first and last name, e-mail address, telephone number or any other personal data provided voluntarily by the User);
- Data provided for recruitment purposes, such as name, surname, e-mail address, telephone number, information about education and social platforms accounts, or any other data provided by the person applying for the position;
- Data provided by Google Analytics, such as an IP address.

### **How long is the personal data stored?**

Pragmatic Coders stores personal data from the moment of the initial contact from the User or when the User starts using the Website (data collected by Google Analytics). After sending an e-mail requesting to delete all personal data provided during the contact with the user Pragmatic Coders may take up to 7 days to fulfil such request.

Personal data collected for the recruitment purposes is stored until the date stated in a job opening advertisement or for the period agreed individually with the applicant.

Exceeding the time limit indicated in the previous sentence is permitted only for the purpose of Pragmatic Coders' performance of obligations arising from the law, e.g. for accounting purposes in relation to Users who have used paid services and in order to defend Pragmatic Coders' interests related to, for example, complaints.

### **Who does Pragmatic Coders transfer personal data to?**

Pragmatic Coders' transfers the personal data of the Users only to companies which provide services that enable execution of Pragmatic Coders services.

- **Gmail and Google Drive** (Google LLC, 1600 Amphitheatre, Parkway Mountain View, CA 94043 USA: personal data can be stored in messages sent to Pragmatic Coders, job applications are stored in Google Drive;
- **Capsule CRM** (Zestia Ltd 20 Dale Street, Manchester, M1 1EZ hello@zestia.com): used to manage customer data;
- **Fakturowania.pl** (Fakturownia Sp. z o.o., 00-389 Warszawa, ul. Smulikowskiego 6/8): invoicing tool;
- **Trello, Inc.** (55 Broadway, 25th Floor, New York, NY 10006) some personal data connected with recruitment is sent and saved at Trello;

Pragmatic Coders informs that the data provided during the contact with Pragmatic Coders and during the recruitment process is transferred to a third country - the United States of America. This is caused by the fact that servers belonging to Trello and Google are located in the United States of America. Trello and Google system ensure the confidentiality of data transferred to the territory of the United States of America. Moreover, the United States of America has been recognized as a state that meets high standards in the field of the protection of personal data. Pragmatic Coders cooperates only with Service Providers who meet the requirements specified in the EU-US Privacy Shield Framework.

In addition, the following programs are used within the Website:

- Google Analytics, Google LLC; address: Mountain View, California, USA: collects data about the User's device (such as the hardware model, operating system version and unique device ID, as well as information about the mobile network, including the telephone number), location information, unique application number, of which some data, including personal data, are stored in the cache of the User's device or application - the so-called Cookies.

### **Cookies and server logs**

In order to facilitate the use of the Website and to monitor its use, the management mechanism uses a technology called Cookies – data saved by the Website's server, a hosting operator: OVH, on the user's computer or mobile device.

The Website uses three types of Cookies:

- *Session cookies* – temporary files, saved on the User's device until he or she signs out, leaves the website or shut downs the browser;
- *Permanent cookies* – saved on the User's device for the time specified in its parameters or until its deletion by the User;
- *Local storage* – stored on the User's device for a definite or indefinite period or until its deletion by the User.

The Cookies are not used to collect any personal data about the users visiting the Website.

The User may at any time disable the option of accepting cookies in the settings of his web browser, however, that might cause malfunctions in the functioning of the Website.

The links to guides concerning disabling the option of accepting cookies in the most popular browsers are presented below:

- [Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Microsoft Edge](#)

The cookies are used in order to:

- create statistics helping to understand the use of the Website so as to improve its content;
- maintain the User's session, thanks to which signing in every time is not required;
- personalize the commercials;
- generate statistics that help in administering the Website and improve the quality of services offered. These summaries are consolidated and do not contain data identifying visitors of the Website. These data are not disclosed to other persons and entities.

Collected server logs, containing, among others the User's IP address, time of arrival of the request, the first line of the http request, the http response code, number of bytes sent by the server, information about the user's browser, information about errors that occurred during the HTTP transaction, information about the type of devices are stored indefinitely.