

Job Candidate Data Processing Policy

 Please read this document to learn why we collect your data and how we process them.

How to read this Policy

1. When we say “you”, we mean any individual we interact with. This interaction occurs because we hold your data or we have obtained them from a third party for the purpose of employment, whether under an employment contract or a civil law agreement.
2. “We” means Santander Bank Polska S.A., including our separate business units, such as Santander Brokerage Poland.
3. Words shown in bold the first time they appear are explained in the Glossary.

Who is responsible for your data and how to contact us

1. We are the controller of your data.
2. You can contact us:
 - a. By sending a letter to the following address: Santander Bank Polska S.A., al. Jana Pawła II 17, 00-854 Warszawa.
 - b. By calling us at 1 9999 or +48 61 81 1 9999 if you call us from abroad.
 - c. By sending us an e-mail to:
 - kontakt@santander.pl
 - d. Through any other contact method indicated at santander.pl.

 If you want to contact us with respect to data protection or your rights arising from the **GDPR**, use any of the indicated contact methods.

3. We have also appointed a Data Protection Officer (DPO). You can contact them about matters related to data protection:
 - a. Using the form on our website: www.santander.pl/RODO.
 - b. By sending a letter to the address: Santander Bank Polska S.A., ul. Kolorowa 10, 60-198 Poznań; please add a note: “Inspektor ochrony danych” (“Data Protection Officer”).
 - c. By sending an e-mail to: iod@santander.pl.

Why we use your data and our legal basis

We may process your data for several reasons:

1. To fulfil legal our obligations or exercise any rights arising from the law. This includes duties resulting from the Labour Code or the Civil Code, maintaining

recruitment records, preventing discrimination, meeting regulatory requirements, and any other employment-related obligations. This covers requests and queries, providing explanations, and supporting your rights (e.g., data protection rights).

Legal basis

GDPR Article 6(1)(c) in connection with Article 5(2)

2. For legitimate interests pursued by us.

We process your data mainly for these purposes:

- a. To run recruitment processes.
- b. To build a talent pool for future recruitment needs.
- c. To prevent misconduct and unlawful behaviours (e.g., corruption, fraud), including checking whether you appear on Polish or international sanctions lists, counteracting unethical behaviour, money laundering, and terrorist financing, as well as ensuring the security of transactions, products and services we provide, and our IT environment.
- d. To measure your satisfaction with our recruitment process.
- e. To provide you with support and guidance, respond to your questions, and improve our recruitment standards. This includes achieving administrative goals for us and the Santander Bank Polska Group, optimising internal processes (e.g., analysing applications, preparing statistics and reports on completed recruitment), and establishing, pursuing, or defending legal claims.

Legal basis

GDPR, Article 6(1)(f)

3. With your consent given for one of these purposes, for example:

- a. You want to take part in future recruitment processes run by us, Santander Bank Polska Group's members, or by our partner branches, agents or intermediaries.
- b. You agree to let us share your data within the Santander Bank Polska Group or with partner branches, agents, or intermediaries.
- c. Your documents include special category personal data.
- d. You provide data beyond what is required by law during recruitment. In such cases, we treat this as your consent to process that data. The consent is always given voluntarily.

Legal basis

GDPR, Article 6(1)(a)

Who we share your data with

We may share your information with:

1. Authorities, organisations and institutions as required by law. Primarily, these are: State Labour Inspectorate (PIP), Polish Financial Supervision Authority (KNF), Head of Personal Data Protection Office (UODO).

2. Partners performing banking activities on our behalf.
3. Members of Santander Bank Polska Group.
4. Our suppliers processing data for us and their employees. These include, for example IT, legal, advisory, clearing, postal and support service providers.
5. Parties to whom data may be transferred based on your consent.

What if your data is sent outside the European Economic Area (EEA)?

We may need to transfer your data to countries outside the European Economic Area (EEA) – known as “third countries,” including the USA. This can happen when:

1. We obtain your consent to do so.
2. The Commission (EU) has decided that the third country or the international organisation ensures an adequate level of protection.
3. Appropriate safeguards are in place, for example, by using EU-approved standard contractual clauses in agreements with the recipient. These ensure your rights are enforceable and you have effective legal remedies in that country.

How long we keep your data

1. When we process your data to meet legal obligations – for as long as they expire.
2. When we process your data for our or a third party's legitimate interests – until you object (for example, to marketing) or until the interest no longer applies – such as when the claims become time-barred.
3. When we process your data with your consent – until you withdraw it.

Your rights and how to use them

You have the right to:

1. Access or rectify your data, demand that we remove the data or restrict their processing.
2. Object to processing, if we process your data (including profiling) based on our legitimate interests and when you have a specific reason to object.
3. Withdraw your prior consent at any time, if we use your data for direct marketing, including profiling. This won't affect any processing done before you withdrew consent.
4. Transfer the data you gave us where processing is based on your consent.
5. Complain to a regulator, if you believe that we process your data in violation of the GDPR. In Poland, that's the Head of Personal Data Protection Office (Urząd Ochrony Danych Osobowych).

We may need extra details to confirm your identity before processing your request.

Where we get your data and what we collect

Most of the information we process comes directly from you. We may also have your data from our employee who suggested you as a candidate for a job opening through an employee referral program, a recruitment agency or your engagement with us.

Some of these are:

1. identification details: name, birth date, personal identification number (PESEL),
2. addresses: home or mailing address,
3. contact details (e.g. phone number, email address),
4. education and previous employment details.

When do we use profiling or automated data processing?

We use automated processes to evaluate certain personal aspects (profiling).

We may apply profiling to:

1. Prevent the misuse of our bank or its services to commit frauds, including money laundering or terrorism financing.
2. Assess your ability to perform the duties listed in the job description.
3. We may use automated processes to assess your skills.

Glossary

Terms	How we understand and define them
Specific categories of personal data:	Data defined in Article 9(1) of the GDPR as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
EEA:	The European Economic Area (the European Union member states, together with Iceland, Norway and Liechtenstein).
Santander Bank Polska Group:	Santander Bank Polska S.A. and its subsidiaries, including its future members. For the list of subsidiaries, please visit www.santander.pl/o-banku/o-nas .
Civil Code:	Polish Civil Code Act of 23 April 1964.
Labour Code:	Polish Labour Code Act of 26 June 1974.

Terms	How we understand and define them
GDPR:	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.

Any questions?

Call us at 1 9999 or at +48 61 81 1 9999 if you are calling from abroad. Calls are charged based on your phone services provider's rates.

 Email us: kontakt@santander.pl