

Privacy Policy

1.0 Introduction

We know that you care about your personal data and how it is used. We take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR). This Privacy Notice will help you understand what personal data Talent Complete collects, why we collect it and what we do with it.

The abbreviation "Talent Complete" and the pronoun "we" and its derivatives herein refer to Talent Complete sp. z o.o., registered at Chrzanowskiego 11, 80-278 Gdańsk, Poland.

Please take a moment to familiarise yourself with our privacy practices and let us know if you have any including any requests to exercise your legal rights, please contact our data protection team using the contact information in section 15 of this privacy notice. You have the right to object to certain uses of your personal data including the use of your personal data for direct marketing. See what your rights are and how you can exercise them in section 8 of this privacy notice.

2.0 Why we collect your personal information

We collect, process and disclose your personal data only for specific and limited purposes. For example, in order to carry out the recruitment process, to assess and handle any complaints, to develop and improve our products, services, communication methods and the functionality of our websites, to provide personalised communication and targeted advertising. For more information, see sections 2.1, 2.2, and 2.3. Additionally, Talent Complete processes your personal data also using automated means. An automated decision is a decision which is made solely by automatic means, where no humans are involved in the decision-making process related to your personal data. Find out more about the automated decision making in section no. 12.0 of this privacy notice. We collect, process and disclose your personal data for the following purposes:

- To manage communications between you and us,
- Where we need to perform the contract we have entered into with you,
- To provide you with information you have requested or which we may feel may be of interest to you,
- To ensure the safe operation of our website and to monitor the performance of our website,
- For marketing and advertising purposes,

- For recruiting employees for us and our clients,
- Develop and offer you our software products, cloud, and other services,
- Protect the quality and safety of our premises, facilities, products or services,
- Secure and, if necessary, defend our protected legal assets against unlawful attacks, assert our rights or defend Talent Complete against legal claims,
- Operate Talent Complete’s internet pages, web offerings, or other online events including analysing the behaviour of the users, enabling you to create a user profile, benefit from an identity service and promote and continuously improve your user experience,
- Organise and conduct competition,
- Organise and conduct open and dedicated training.

When we collect and use your personal data for purposes mentioned above or for other purposes, we will inform you before or at the time of collection. Where appropriate, we will ask for your consent to process the personal data. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

2.1 Processing of personal data for recruitment purposes and within the candidate recommendation system

Talent Complete recruits for its own needs as well as for its clients such as services connected with providing Specialists. Therefore, be mindful that your personal data may also be processed by Talent Complete’s clients.

Additionally, note that when you give your consent to participate in a specific recruitment process for a particular job position, you can also give your consent to participate in future recruitment processes. If you give such consent, your personal data will be securely stored in Talent Complete’s database and will be used to provide you with information on job positions that are tailored to your unique profile and professional experience.

The User may withdraw consent to further processing of personal data. It may be done if the withdrawal does not affect the legal use of personal data in activities conducted on the basis of the consent granted before the withdrawal. Personal data may be also processed if the User has been recommended by another person. In such a case, the recommending person enters their own personal data, data of the recommended person with his/her CV. Talent Complete verifies the received CV taking into consideration the consent, that meets the requirements of the GDPR, of the recommended person to process his/her personal data. If such consent has been granted, Talent Complete has permission to use the data for recruitment process purposes.

2.2 Processing of personal data for marketing purposes

By submitting an inquiry or signing up for a training, conference or other event organized by Talent Complete, the User may consent to the processing of personal data in order to receive marketing information on products and services offered by Talent Complete, including newsletters.

User's consent for processing personal data is the legal basis for sending newsletters. It can be granted while providing one's e-mail address in the newsletter subscription form or gated content as well as by checking a box while completing a contact or recruitment form. Providing the e-mail address in the newsletter subscription form is a clear affirmative action of consenting to processing personal data as defined in Article 4 (11) of GDPR regarding the definition of consent as well as connected 32nd motif of GDPR explaining the clear affirmative action.

According to the abovementioned motif, a clear affirmative action includes informing Talent Complete that the User's e-mail address provided in the form may be used for sending a newsletter that includes Talent Complete's promotional information. It is one of the acceptable forms of consenting to using the provided e-mail address for the defined purpose (such forms also include checking a box located near the content of the consent).

Consent to sending unsolicited marketing information, according to the rules for electronically supplied services, is provided by the user independently and separately by checking a dedicated box located near the content of the consent.

In order to obtain some materials uploaded to Talent Complete's website, it may be necessary to complete a form that requires providing personal data. Such data will be processed according to the consent (Art 6 (1) (a) of GDPR) expressed by a clear affirmative action. If the User wishes to receive other marketing information, he/she may state so by checking a relevant box. If the User does not state so, it means that he/she is not interested in receiving other information thus Talent Complete will not send it.

2.3 Processing of personal data for system testing and development purposes

To ensure the high quality of our services and the continuous development of our systems, Talent Complete may create copies of databases containing personal data of candidates for the purpose of testing system improvements. This data is used exclusively in a test environment, with appropriate technical and organisational security measures in place to ensure its protection. These copies are created and stored for the period necessary to carry out the tests and implement the improvements, after which they are deleted in accordance with our data retention policy. Access to this data is strictly limited to authorised employees involved in the system development process. The legal basis for this processing is Talent Complete's legitimate interest (Art. 6(1)(f) of the GDPR) in improving our systems and services, which in turn allows us to provide more effective

recruitment services for the benefit of both candidates and our clients. If you do not consent to the processing of your personal data for this purpose, you have the right to object by contacting us using the contact details provided in section 15 of this privacy policy.

3.0 Lawful basis of processing information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract.
- If the processing is necessary for compliance with a legal obligation to which the controller is subject.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

- The purpose test – to identify the legitimate interest.
- Necessity test – to consider if the processing is necessary for the purpose identified.
- Balancing test – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

4.0 What personal data we collect and where from

Personal data means any information that can be used to identify directly or indirectly a specific individual. You are not required to provide Talent Complete the personal data that we request, but if you choose not to do so, we may not be able to provide you with our products or services, or with a high quality of service or respond to any queries you may have. We collect personal information from you, for example, if you register to our website, request product information, call us or use any of our services. You may be asked to provide your personal information when you contact us. The categories of personal information that we may collect, store and use about you include:

- Name, address, telephone number, email;
- IP address;
- Information on Resume: Work experience history, skills, and education history etc.

We may share your personal information between Talent Complete's related companies and use it in a manner consistent with this privacy notice.

4.1 Special category data

Certain categories of personal data, such as race, ethnicity, religion, health, sexuality or biometric data are classified as “special categories of data” and benefit from additional protection under the European data protection legislation. We do not collect any special category data and we also request you do not provide any special category data in your resume and applications for recruitment. If we still receive such data, we will delete it at the earliest opportunity. If we will process special category data, it will be informed to the data subjects and an article 9 exception will be identified that may allow us to do so.

4.2 Third-party collection of personal data

We may also collect your data through Third Parties which Talent Complete requires to ensure your or your employer’s satisfaction with our products, services and offerings.

5.0 How long we keep information for

We pride ourselves on ensuring that your personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. We will actively review the personal data we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal business or consumer need for it to be retained. All personal information collect has a defined retention period, which is in-line with our retention policy. If you would like to find out how long your information is being retained, please see “additional information”, section 17 of this policy.

6.0 Security of personal information

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction. We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so. We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see “additional information”, section 17 of this policy.

7.0 Children's information

We do not knowingly collect information on children. If we have collected personal information on a child, please contact us immediately using the details in section 15, so we can remove this information without any undue delay.

8.0 Your individual rights

In this Section, we have summarised the rights that you have under the EU GDPR article 15-21. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- Right to Object;
- Right of Access;
- Right to be informed;
- Right to Rectification;
- Right to Erasure;
- Right to Restrict Processing;
- Right to Data Portability;
- Right related to automated decision-making;

8.1 The right to object;

You can exercise this right if:

- Processing relies on legitimate interest;
- Processing is for scientific or historical research;
- Processing includes automated decision making and profiling;
- Processing is for direct marketing purposes.

8.2 The right of access:

- You or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge.
- We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.

8.3 The right to be informed:

– We are required to provide clear and transparent information to you about how we process your personal data.

This privacy notice addresses this right.

8.4 The right of rectification:

– If you believe the personal data we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made.

8.5 The right to erasure:

– If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it.

8.6 The right to restrict processing:

You may ask us to restrict the processing of your personal data. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:

- Processing is unlawful
- We no longer need the personal data, but it is required for a legal process
- You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
- If you are exercising your right to rectification

8.7 The right to data portability:

You can request that your personal data is transferred to another controller or processor in a machine-readable format if:

- Processing is based on consent
- Processing is by automated means (i.e. not paper based)
- Processing is necessary for the fulfilment of a contractual obligation

8.8 Rights related to automated decision-making.

You have the right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on you. In particular, you have the right:

- to obtain human intervention;
- to express your point of view;

- to obtain an explanation of the decision reached after an assessment; and
- to challenge such a decision.

If you have any question about these rights, please see “additional information”, section 17 of this policy.

9.0 Consent

Where you have given consent for processing of personal data, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal.

10.0 Failure To Provide Personal Information

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

11.0 Cookies

Our website uses cookies. Please see our cookies policy here for full details of the cookies used.

12.0 Automated decision making

Talent Complete is active in the recruitment and outsourcing of employees. To optimise the recruitment process and support the management of the employee’s career path, Talent Complete uses an automated recruitment process consisting of:

- screening and ranking candidates’ CVs
- completing the content of offers
- building and recommending career paths

The tool will process the data provided by the candidate in the CV, such as:

- name, address, date of birth, etc.
- educational history
- employment history
- skills, courses, certificates, training.

During the recruitment process, your personal data is used for automated decision in

order to improve the recruitment and HR processes. We don't make decisions based solely on automated decision-making that have a significant impact on you.

If we do, we will notify you and provide you with clear information about our decision to rely on automated processing to make the decision and the legal basis for doing so.

If you would like more detailed information on the automated recruitment process, please contact our compliance team via email at rodo@seargin.com.

13.0 Transfers To Third Parties

Talent Complete may disclose your personal data, listed in section 4 to some third parties to help deliver our services/products. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all of the following categories of recipients:

- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you
- Companies affiliated with Talent Complete personally or by capital, when necessary for administrative purposes and to provide services to you
- Third parties that support us to provide products and services e.g. IT support, cloud-based software services, providers of telecommunications equipment
- Marketing services providers
- Payment service providers
- Professional advisors e.g. lawyers, auditors
- Web analytics and search engine provider to ensure the continued improvement and optimisation of our website.

14.0 Transfers outside of the EEA

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the United Kingdom and European Economic Area (EEA).

We may share personal information to third parties outside of the UK and EEA. Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the UK GDPR, EU GDPR and other Data Protection laws in the EU and the UK.

Where personal data is transferred outside of the EEA and the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

- EU Standard Contractual Clauses
- Binding Corporate Rules
- An exception as defined in Article 49 of the EU GDPR

For more information about transfers and safeguarding measures, please contact us using the information in section 17.

15.0 Right to complaint

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on: rodo@talentcomplete.com
Alternatively, you can contact us by Post at: Chrzanowskiego 11, 80-278 Gdańsk, Poland.

If you are not satisfied with our response, you may make a complaint to the data protection authority, [Urząd Ochrony Danych Osobowych \(UODO\)](#)

16.0 Additional information

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy policy or if you wish to receive more in-depth information about any topic within it, please contact our Compliance Team via email on rodo@talentcomplete.com.

17.0 Policy Review and Amendments

We keep this Policy under regular review. This Policy was last updated on 01/04/2026.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.