



MetLife Europe Services Limited Oddział w Polsce

Privacy information – HR

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1 Introduction

MetLife Europe Services Limited Oddział w Polsce (*MetLife Europe Services Limited Branch in Poland*), hereinafter referred to as MetLife, makes every effort to protect the confidentiality and security of [personal data](#). This document containing information on privacy protection, hereinafter referred to as “**Information**”, lays down the rules on the use of personal data relating to candidates for work, present and former employees (including persons providing services under civil law contracts) and their family members.

For better understanding of the expressions used in the Information, their definitions have been placed in the [Glossary](#), which you will find at the end of the document.

2 How can you obtain support?

If you need help or you have any questions related to the Information, or the rules of collecting, making available or using personal data do not meet your expectations, contact our Data Protection Officer at the following e-mail address: dpo_mesl@metlife.pl or at MetLife premises in Warsaw, Rondo Daszyńskiego 1.

If you are dissatisfied with the processing of data by us, we would like to know that. You can inform us at the above addresses.

If our response is not satisfactory for you, you may inform President of the Personal Data Protection Office:

- at +48 22 531 03 00,
- electronically at the e-mail address: kancelaria@uodo.gov.pl or via an Electronic Inbox (accessible to individuals with a secure electronic signature),
- in writing to the following address: Urząd Ochrony Danych Osobowych, ul. Stawki 2, 00-193 Warszawa.

3 Who are we?

MetLife is the [Controller](#) of your personal data. This information refers to the collection and use of personal data by any of the MetLife companies mentioned in the “Introduction” clause. The registered office of each of the companies is located in Warsaw, Rondo Daszyńskiego 1.

4 How do we obtain your data?

We obtain information directly from you during the recruitment process or in connection with employment. The data of your family members are also obtained from you. What is more, data concerning you can be made available to us by other entities, including public administration bodies, on the basis of applicable law or the consent you granted.

You can provide and update the information provided to us at any time by reporting such a need to HR – the HR employee will help you modify it. The update of a portion of the data may need to be made in writing.

5 What information about you are we collecting?

Data that we obtain directly from you

In the case of candidates for work, we collect the information specified in Article 22¹(1) of the Labour Code and additional information, if it is provided by the candidate.

In the case of Employees, we collect the information specified in Article 22¹(2)–(5) of the Labour Code and information resulting from separate regulations, including health information.

In the case of the Employee's family members, we collect the information specified in the Labour Code and other information provided by the Employee.

In the case of persons providing services under civil law agreements, we collect information to the extent necessary for the performance of the agreement and for the fulfillment of the requirements laid down in the provisions of law.

[The collection](#) and processing of all such data results from the provisions of law or requirements necessary for the conclusion and execution of the agreement, or from the legally justified purpose of the data controller (mainly in the field of processes aimed at ensuring security on the premises).

In exceptional situations, based on the voluntary consent given by the Employee, we may collect additional data of the Employee or her/his family members, to the extent and purpose specified in a given case.

Data that we collect about you during and after the period of employment

Types of personal data	Why do we need these data?
Identifying information , including: names, surname, age, date and place of birth, sex, language of communication, identification numbers, nationality, and residence and work permits	<ul style="list-style-type: none">✓ legal and regulatory compatibility✓ human resources management✓ company communication✓ business processes execution
Health status data , including: occupational health clearance, insurance clearance, documentation related to accidents at work, documentation related to requests for assistance, disability certificate	<ul style="list-style-type: none">✓ legal and regulatory compatibility✓ human resources management

<p>Contact details, including: private e-mails, contact phone numbers, contacts to the person to be notified in the event of an accident, address of permanent residence, address of actual residence or correspondence address</p>	<ul style="list-style-type: none"> ✓ legal and regulatory compatibility ✓ human resources management ✓ business processes execution ✓ company communication ✓ tax law
<p>Data of family members and relatives, including: names, surname, date of birth, identification numbers, address of actual residence, contact phone number, health information</p>	<ul style="list-style-type: none"> ✓ legal and regulatory compatibility ✓ human resources management ✓ benefits management
<p>Information related to recruitment, including: CV, cover letters, previous employment information, references, seniority, criminal history, education, training, confirmation of qualifications, remuneration and reward information, information on skills, including language skills, interest, information on working opportunities at specified locations</p>	<ul style="list-style-type: none"> ✓ legal and regulatory compatibility ✓ business processes execution ✓ human resources management ✓ recruitment and selection process
<p>Information related to employment in a given position, including: name of employer, name of position, department/division/unit, function, family of positions, superiors and subordinates, identification numbers, employee status (active, inactive), employment conditions, right to benefits and information on details of benefits, employment history, employment dates, date of termination of contracts, information about promotions, disciplinary proceedings, employee claims, dates and conditions of international transfers and transfers between companies</p>	<ul style="list-style-type: none"> ✓ legal and regulatory compatibility ✓ human resources management ✓ benefits management ✓ company communication
<p>Information related to remuneration, including: basic salary, working time records, leave information, information about bonuses, prizes, additional remuneration, information about deductions and orders, bank account numbers, dates and frequency of remuneration</p>	<ul style="list-style-type: none"> ✓ legal and regulatory compatibility ✓ human resources management ✓ benefits management
<p>Information on work performance, including: details of feedback from superiors and collaborators, employee assessments, annual objectives and results, development plans, development needs, aspirations, potential opportunities, information on promotions and</p>	<ul style="list-style-type: none"> ✓ legal and regulatory compatibility ✓ human resources management ✓ benefits management

displacements, exemptions, reminders, reprimands, disciplinary proceedings	
Information related to the use of technology , including: work tools, access to company systems and accounts, corporate applications, software, communication created with the use of corporate devices and networks, content of the professional e-mail, company badges	<ul style="list-style-type: none"> ✓ company safety management ✓ company communication ✓ business processes execution ✓ human resources management
Image , including: photographs and videos, including recording	<ul style="list-style-type: none"> ✓ company safety management ✓ company communication

6 To what extent do we collect your personal data?

Your personal data are [collected](#) for the purpose of:

- maintenance of legal and regulatory compatibility
- fulfilment of obligations resulting from the provisions of law related to human resources management
- business processes execution
- benefits management
- company safety management
- company communication
- for the statistical and management needs of [MetLife](#)

7 To what extent do we process personal data not belonging to the category of specific data?

The basis for the processing of personal data is dependent on the purpose for which we process personal data. Our activity is governed by specific provisions of law. In the case of employment, the basis for data processing is the Act of 26 June 1974 – The Labour Code, together with related acts, and the performance of the agreement and the provisions of law which are also the basis for the processing of personal data of your relatives (including beneficiaries, rightholders).

We also process personal data in a legally justified objective of the data controller, including:

- safety assurance,
- motivating and improving personnel qualifications
- possibility of communication in the [MetLife](#) Capital Group

- implementation of corporate policies and procedures.

In exceptional situations when MetLife carries out additional activities not directly related to your work for MetLife, we may process personal data about you or your relatives, based on your voluntary consent. The purpose of such processing is always specified at the time of collecting consent.

8 Basis for processing specific categories of personal data

The processing of specific categories of personal data is based on the provisions of law. Out of this type of data in MetLife, we process the information about the state of health.

In exceptional situations, we may also process information regarding your health condition based on your voluntary consent.

9 How are we making available and entrusting your personal data?

Your data are [made available](#) only to entities authorised to receive them:

- [MetLife](#) capital group, in connection with the centralisation of data on the basis of the justified interest of the data controller;
- public authorities and other entities at their justified request and on the basis of an obligation resulting from the provisions of law;
- third parties under concluded contracts, including in order to fulfil obligations resulting from the provisions of law.

In the event of entrusting the processing of personal data to the cooperating parties or subcontractors, we commit them to implement and apply adequate security measures, and we are subjecting them to cyclical controls. Data may also be entrusted to entities having their registered office or processing data outside the European Union, in particular in the United States and in India, mainly to the entities of the [MetLife](#) capital group, in connection with the centralisation of data and in order to communicate in the MetLife capital group.

Data processing by these entities takes place only on the basis of a legally permissible mechanism guaranteeing an adequate level of data protection. One such mechanism is the standard contractual clauses, the content of which was approved by the European Commission.

10 Procedure in case of ownership changes

There may be a situation in which a transformation or acquisition of our institution by another entity takes place, and your personal data and the personal data of your relatives will be transferred to the new entity. We will ensure that the new entity will process the entrusted data for the same purpose as we have done so far. In the event of a change in the purpose of processing, such information shall be communicated to you, if you will be MetLife employee.

11 How do we protect your data?

Protecting and ensuring the confidentiality of your personal data is very important to us. There is no perfect security that would be impossible to breach, but in order to minimise the risks, we have implemented technical, organisational and physical security measures in order to:

- protect your data against unauthorised access or use,
- secure information systems and protect information,
- make it possible to return your data in the event of a loss of their integrity or loss as a result of a crisis situation.

When necessary, we use encryption mechanisms or other means of protecting your data. We periodically review our safety procedures, in order to analyse the solutions used and assess the necessity of modifying them.

12 How long do we store your data?

Our procedures for storing information are in line with the applicable provisions of law in this regard. The time for which we can store information about you is defined in the provisions of law. If the storage time expired, personal data held by us will be destroyed in a secure manner which does not allow them to be read. If we use data for statistical or similar purposes after the lapse of the definite data storage time, such operations will take place on anonymised data, the form of which does not allow your identity to be determined. If you want us to store your data after the data storage time, you can always ask us to do so before the expiry of the data storage time. Please contact us for this purpose.

13 How will you learn about the information update?

This information may be updated at any time. If any changes are made, we will inform you thereof. The current version of the information can also be found on a publicly accessible website for MetLife employees in Poland.

14 Applicable law

The principles set forth in this information are governed by the Polish law. This does not preclude the application of the European law, in particular [the General Data Protection Regulation](#).

15 Your rights to privacy

The following rights are set out below:

- are linked to privacy and relate to the processing of your personal data,
- they are not absolute rights and are applicable to specific situations and grounds for data processing.

More information about data processing is obtained from the President of the Personal Data Protection Office, with his/her registered offices at ul. Stawki 2, 00-193 Warsaw, or at www.uodo.gov.pl.

All questions or requests related to the protection of personal data in [MetLife](#)? Contact Inspector General for the Protection of Personal Data dpo_mesl@metlife.pl.

16 What can you request?

- access to your personal data, including information about your personal data free of charge

Your request may include a demand for:

- a) confirmation that your data are processed,
- b) indication of the scope of data we are processing,
- c) indication of the recipients or categories of recipients of the data.

However, if your request for information on personal data is unfounded or repeated, we can refuse to provide information.

We will respond to your request as soon as possible, not later than within 30 days. Should the provision of information take more than one month, we will inform you thereof. In any case, we will provide an answer not later than within three months.

You can request a paper and electronic copies of the data we have, make available or use. In order to consider your notification, we can ask you for more information about you in order to confirm your identity or to identify the information you are requesting. We can only provide you with information about you. If the request was to result in a breach of the privacy of another person, we may refuse to provide you with such information. In certain cases, resulting from, e.g., legal regulations or professional secrecy, we may not be authorised to provide information. We kindly ask you to precisely indicate the information requested by you. Otherwise, it may be necessary for you to provide additional explanations in this regard.

- **correction and completion of data**

You have the right to request immediate modification of incorrect data relating to you. If you inform us that data that we have on you are incorrect, we will verify this, and if the request is justified, we will correct the data.

The right to complete data is applicable in all cases, while it is dependent on the purposes for which we process data.

We also have a duty to inform the entities to which we made your data available, with your consent, about the update you notified. We will take the necessary steps in this direction, and if this proves impossible or proves that this requires too much work, forces or costs, we will not do it. Alternatively, we can inform the entity to whom we have made the data available on the need to perform such verification in its own scope.

- **erasure of data (right to be forgotten)**

You may request the erasure of data when:

- ✓ the data are no longer needed for the purpose for which they were collected,
- ✓ the sole basis for data processing was the consent that was withdrawn,
- ✓ an objection to the processing of data was filed and there are no legally justified purposes for storing such data,
- ✓ the data were processed in breach of law,
- ✓ the data must be erased in order to ensure compliance with the law.

The right to erase data does not apply where your data are processed for the purpose of implementing the agreement or on the basis of the provisions of law, and, after being removed, we will not be able to ensure continuity of the processes.

If your data are made available to another entity, we are obliged to inform that entity about your request to erase data, so it can also erase these data. We will take the necessary steps to provide the entities with information about your request, however, this may be impracticable or require us to take a disproportionate effort, force and resources. It may also prove that the recipient cannot erase the data at your request, because it processes them in accordance with the law or in order to implement the agreement.

- **request for restrictions of data processing**

You have the right to object to your data processing, if:

- ✓ in your opinion the data that we have is incorrect – until data correctness is verified,
- ✓ the data are processed incorrectly, but you have previously expressed your willingness to store them instead of erasing them,
- ✓ we do not need your personal data, but they are indispensable to you in order to establish or claim compensation,
- ✓ objections were made to the processing of personal data for legally justified purposes – until the admissibility of such processing is determined by us.

If the data are made available to another entity, we are obliged to inform that entity about your request to restrict data processing, so that it can also stop the processing of data. We will take the necessary steps to provide information about your request, however, this may turn out to be impracticable or require us to take a disproportionate effort, force and resources. It may also prove that the recipient may not restrict the processing of data upon your request, as it processes them according to the provisions of law or in order to implement the agreement. If, in our opinion, your request to restrict data processing cannot be accepted by us, we will inform you thereof.

- **expressions of objection to the processing or withdrawal of the consent**

You have the right to object, in specific circumstances, to the processing of data on the basis of a legally justified objective of MetLife. If the legitimate interest of MetLife is indeed proven to be more important than your objection to the processing of data, we can continue to process these data. In any other case, we are obliged to stop their processing.

You are also entitled at any time to withdraw any of the consents to data processing free of charge. However, this does not preclude the right of MetLife to further process your data on another existing basis, i.e. the performance of the agreement or the legal obligation.

- **data portability**

You can use the right to data portability: only in respect of personal data that you have made available to us (excluding other data), when data are processed on the basis of consent or for the purpose of implementing the agreement, where processing is carried out by automated means. We can refuse to transmit data, if the processing does not meet the above-mentioned criteria. In addition, if the data we hold refer to more than one person, we may not have the technical capability to transmit your data in such a way as not to violate the rights and freedoms of others.

17 Glossary

Controller means an entity determining the purposes and means of the processing of data, both alone or jointly with other controllers.

Personal data means information relating to a directly or indirectly identified or identifiable natural person.

Collection of data means acquisition of data for the purpose of employment or consolidation of data for the purpose of carrying out corporate processes.

Processing means operations performed on personal data, such as collection, recording, organisation, cataloguing, storage, alteration, search, consultation, use, making available, erasure and destruction.

Making available means the transfer of personal data to a third party having its own basis for their processing, which, after transmission, becomes a separate **Controller**.

Entrusting the processing means the processing on the instruction and within the scope specified by the **Controller**, performed by a third party, bound with the **Controller** by an agreement or any other legally binding instrument.

The **Agreement** means an agreement concluded between MetLife and the employee on the basis of the Labour Code or the Civil Code, depending on the arrangements made between the parties.

General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and of the Council 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).

MetLife means MetLife Europe Services Limited Branch in Poland with its registered office in Warsaw, Rondo Daszyńskiego 1.