



PRIVACY POLICY OF KIWI.COM

KIWI.COM EVENTS & COMMUNITY

Welcome to the Privacy Policy of Kiwi.com Events and Community.

If you are reading this, one of two possible scenarios should apply to you:

1. You're either thinking about attending, are attending, or have attended one of the events that we organize or partner with, or
2. you chose to become a member of the Kiwi.com Community.

For the purposes of organizing our events and to be able to keep in touch with you with our job offers and other relevant information, we need to process your Personal Data. In this Privacy Policy, we explain exactly why and how we do that and provide you with other important information which you need so that you always remain in control of your privacy.

A. WHO ARE WE AND HOW CAN YOU CONTACT US?

We, as the Data Controller, are the company **Kiwi.com s.r.o.**, with a registered office at Rohanské nábřeží 678/25, 186 00, Prague 8-Karlín, Czech Republic, Company ID No.: 29352886, registered in the Commercial Register maintained by the Municipal Court in Prague, File No. C 387231, Tax ID No. CZ29352886.

For all matters concerning privacy and data protection, you can always contact us via email privacy-community@kiwi.com.

B. SOME TERMS THAT WE USE IN THIS PRIVACY POLICY

Personal Data: any information relating to a directly or indirectly identified or identifiable natural person. That means that if we possess means to identify either you or even the device you're using, any information that we can connect to you will be treated as Personal Data.

Data Controller: someone that determines the purposes and means of processing Personal Data. For example, we are a Data Controller when we process your Personal Data for the purposes stated in this Privacy Policy. Each Data Controller (to whom the GDPR or similar legal regime applies) should have a Privacy Policy such as this one where



you can learn about how your Personal Data is processed. You can see the full list of Data Controllers we might share the data with below.

Data Processor: a third party that only helps to achieve the purposes determined by the Data Controller. For example, we as a Data Controller use many third-party services to which we outsource some parts of our activities that we don't do ourselves for various reasons such as cost efficiency. A Data Processor is only allowed to process your Personal Data according to our documented instructions, and the GDPR obliges us to have a strict formal contractual relationship that ensures a truly sufficient protection of your privacy.

Third Countries: countries in which the GDPR regime is not applicable. Currently, by Third Countries we mean all countries that lie outside of the European Union.

C. PARTICIPANTS OF THE KIWI.COM EVENTS

We process your Personal Data to be able to organize the event, to improve our ability to organize other events, and for the promotional purposes of Kiwi.com in connection to this event or future events. In this Privacy Policy, you will learn how and why we use your Personal Data and with whom we might share it.

C.1 WHAT PERSONAL DATA WE PROCESS AND WHERE DO WE GET IT?

We process the following categories of your Personal Data obtained directly from you or generated by your activity or our staff:

- a) identification details (Name and Surname),
- b) contact details (e-mail),
- c) photographs and videos taken during the event,
- d) information generated by your activity or our staff, and
- e) information provided by you on the application form relevant for the event.

C.2 FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

PURPOSE	DESCRIPTION	LEGAL GROUND
Organization of events	The main and most important purpose for which we need to process your Personal Data is the organization of the event itself. The processing of Personal Data for this purpose includes processing of your applications, administration of the list of participants, and other necessary activities. This processing is done on the basis of the fulfillment of an agreement. In many cases, we don't actually conclude any formal contract but there is an implicit non-verbal agreement which is concluded	Art. 6(1)b) GDPR - Necessity for the conclusion and performance of a contract



	<p>between our participants and us when we accept their application.</p> <p>If you provide us with information about your food allergies, we will process your Personal Data relating to health for the purpose of organizing the event, specifically to ensure that the catering meets your dietary needs. This processing of Personal Data is based on your explicit consent. You may always revoke your consent by getting in touch with us at privacy-community@kiwi.com.</p> <p>However, it is important to note that if you do withdraw consent for the processing of your Personal Data for the event organization purposes, we will no longer be able to accommodate your dietary restrictions and take into account the information about your food allergies for the catering services.</p>	<p>Art. 6(1)a GDPR - Consent</p>
<p>Improving our ability to organize events</p>	<p>We would also like to process your Personal Data for the purpose of improving our ability to organise events. After the event, we might send you a feedback form where we ask you for your opinion regarding your experience at the event. Completion of the feedback form is voluntary. We will only process your Personal Data for this purpose if you give us your consent through the feedback form. You may always revoke your consent by getting in touch with us at privacy-community@kiwi.com.</p>	<p>Art. 6(1)a GDPR - Consent</p>
<p>Promotional purposes</p>	<p>Another purpose for which we might use your Personal Data (such as photos or videos where you appear) is the promotion of the event on which you participated and similar events in the future. We usually promote our events through our social media accounts, through our YouTube channel, through our newsletter and through paid adverts. This processing is done based on our legitimate interest in marketing. If you</p>	<p>Art. 6(1)f) GDPR - Necessity for the purposes of our legitimate interest (Promotion & Employer Branding)</p>



	don't want us to process your Personal Data for this purpose, you may always object to it by writing us an email at privacy-community@kiwi.com .	
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D. MEMBERS OF KIWI.COM COMMUNITY

If you applied for one of our events, you were given the choice of becoming a member of the Kiwi.com Community. In this section of our Privacy Policy, we explain the purposes for which we need to process the Personal Data of our members.

D.1 WHAT PERSONAL DATA WE PROCESS AND WHERE DO WE GET IT?

We process the following categories of your Personal Data:

- a) identification information (Name and Surname),
- b) contact details (e-mail),
- c) your professional information (work experience, education, skills, languages, interests,...),
- d) hyperlinks to your social media profiles, and
- e) information generated by your activity or our staff.

The identification information and contact details we obtained directly from you, the professional information is downloaded by our CRM (Talkbase) from the social media profiles such as LinkedIn or GitHub which were linkable to the contact details that you have provided to us. You can learn more about the data processing behind Talkbase at <https://talkbase.io/privacy-policy>. The rest of the data is generated either by your activity (e.g. log about unsubscription from a newsletter) or by our employees (we might assign you a tag to sort you into some category because we think that you'd be interested in a specific type of content).

D.2 FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

PURPOSE	DESCRIPTION	LEGAL GROUND
Newsletter with future events and job offers at Kiwi.com	<p>The whole point of being a member of the Kiwi.com Community is to stay up to date with the events which we organize, the most recent job offers and other interesting stuff about our company.</p> <p>If you give us consent to become a member of the Kiwi.com Community, we'll subscribe you to our newsletters, the invitations to our events and to job offers. You can always change this by unsubscribing through a link which you'll find in every email that you'll receive from us. If you want to just go to the event and don't want to receive any messages,</p>	Art. 6(1)a) GDPR - Consent



	<p>simply don't check any of the checkboxes related to subscription and your Personal Data will be deleted automatically after the event you're applying for ends.</p> <p>Kiwi.com is a large company and almost all skill sets have some application here. However, we don't want to spam our community members with messages which they aren't interested in. Therefore, we use the information that we collect from the social media profiles to send invitations to our events, job offers and other messages tailored according to the skill set and interests of every individual member. This is done through a tool called Talkbase. We create a profile for you within this tool and it automatically finds your profiles based on your email address. It then downloads information such as your work experience, education, skills, languages and interests and periodically updates them. Based on this data, we can sort you into specific categories and send you content which we think you'll be most interested in. You can learn more about the data processing behind Talkbase at https://talkbase.io/privacy-policy.</p> <p>From the moment you give us your consent, we will retain your Personal Data for 3 years. Afterwards, we will ask you for your confirmation, whether you'd like to stay engaged, and unless you give us your consent, we will delete all your Personal Data.</p>	
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E. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

E.1 SHARING DATA WITH OTHER DATA CONTROLLERS

In some cases, we will share your Personal Data with third parties for their purposes. Each third party controller will treat your Personal Data in accordance with their own Privacy Policy (which is published on their website). Disclosure of Personal Data to other service providers will be done in accordance with the applicable Personal Data laws and regulations.

PURPOSE	PARTNERS
Promotion We use these partners for the promotion of the events you participated in and similar future events. If you haven't participated in any of our events, this doesn't apply to you.	Social media sites Digital news media outlets



E.2 SHARING DATA WITH DATA PROCESSORS

In order to do our work in the most effective way, we use many tools and apps which help us. The providers of such tools are third-parties so technically, the Personal Data is sent to other companies and we need to inform you about such transfers. However, in such cases, these third parties are acting on our behalf as our Data Processors and we always stay in control of your Personal Data. That means that even though the Data Processors are in possession of your data, they can only process it for our purposes and we are always in charge of it. They cannot under any circumstances use the data for their own purposes or use the data in a way that would go against our agreement.

Furthermore, we only use partners that have given us sufficient guarantees that they comply with the GDPR requirements and that your data will always be kept safe.

PURPOSE	PARTNERS
Mailing tool We use a mailing tool that enables us to efficiently administer our mailing database.	Mailchimp (The Rocket Science Group LLC)
Event organization platforms For the purpose of the organization of our events and their promotion, we use certain platforms to connect with our (potential) participants.	EventBrite.com (Eventbrite, Inc.) Meetup.com (Meetup, Inc.) Talkbase.io (Talkbase, Inc.)
Administration We use a tool which allows us to manage a database of people interested in Kiwi.com and to send them invitations to our events and job offers.	Talkbase.io (Talkbase, Inc.)
Evaluation of applicants Sometimes, before we decide whether to choose a certain applicant for an event, we give them a coding task that they need to solve beforehand. For this, we use a tool called Codility.	Codility Ltd.

F. HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

In general, we will process your Personal Data until we won't need it for any of these purposes defined in this Privacy Policy. The maximum length of processing is 3 years after the collection of the Personal Data (or more if you renew your consent after this initial period).



G. HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA?

We want you to always be in control of your Personal Data. To this end, you have certain rights that allow for it. Under certain conditions, you may:

- a) Gain access to all your data that we use or processing, and even get a copy of all of it;
- b) Ask us to delete your data;
- c) Correct the data that we are processing if you think that there are mistakes;
- d) Restrict the processing of your data;
- e) Receive your Personal Data in a commonly used and machine-readable format or to have this data transmitted to a different provider.

You can exercise your rights and revoke any of your consents by contacting us at privacy-community@kiwi.com.

H. TRANSFERRING YOUR DATA OUTSIDE OF THE EUROPEAN UNION

We will only transfer your Personal Data to Third Countries in cases where it is necessary given the residency of our Data Processor and the Data Controllers which are listed in this Privacy Policy. When transferring to countries without adequate regulations according to the Art. 45 GDPR, we will only do so after we obtain the necessary safeguards, specifically the Standard Contractual Clauses or Binding Corporate Rules.

I. DATA PROTECTION OFFICER

With regard to all issues related to processing of your Personal Data and to the exercise of your rights under the GDPR, you may always contact our Data Protection Officer.

Oliver Švolík

Data Protection Officer of Kiwi.com
privacy-dpo@kiwi.com

J. COMPLAINT WITH THE SUPERVISORY AUTHORITY

Data Protection is a serious matter and the rules are quite difficult to implement correctly. No one is perfect, and it may happen that we make a mistake. If you feel that we mishandled your Personal Data, please turn to us first. We promise that we will try our best to resolve the situation. You can always approach us with any privacy or data protection related issue at privacy-community@kiwi.com.

Nevertheless, at any time, you have the right to lodge a complaint with a supervisory authority. If you are from the EU, you can lodge a complaint at the authority in the member state of your residence, in the member state where you work or in the member state of the alleged infringement.

Generally, the complaints will be handled by the Czech Office for Personal Data Protection. You can learn more at <http://www.uoou.cz>.