

# PRIVACY NOTICE

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17 April 2023 version

## 1. Who are we and how can you get in touch with us?

1.1 Yalantis Limited ("Yalantis", "we" or "us") handle your personal data responsibly and with your privacy in mind and in accordance with current data protection legislation (including GDPR and other relevant regulations such as national laws and regulations).

1.2 Affiliates: We may disclose your personal data to our affiliates, meaning an entity that controls, is controlled by or is under common control with Yalantis Limited. Our affiliates may use the personal data we share in a manner totally consistent with this Privacy Policy.

1.3 Yalantis is the personal data controller for the personal data processing that takes place within the framework of our business or other activities. This Privacy Notice explains which categories of personal data we collect and process, why they are processed, and which rights you have. You also receive information on how you can assert your rights. You will always find the most recently updated version of this information on our website [www.yalantis.com](http://www.yalantis.com).

1.3 Contact us or personally our Data Protection Officer for any questions regarding our processing of your personal data, or if you wish to exercise any of your rights:

Requests form

Yalantis Limited (HE 426115)

Email: [privacy@yalantis.com](mailto:privacy@yalantis.com)

Postal address: Arch. Makariou III, 95, 1st floor, Flat/Office 102, 1071 Nicosia, Cyprus

Data Protection Officer: Nadiia Bakharieva, [dpo@yalantis.net](mailto:dpo@yalantis.net)

## 2. How we process your personal data

### 2.1 We obtain your personal information from:

- Directly from you
- Browser

## 2.2 The Notice extends to

1. Yalantis Website: [www.yalantis.com](http://www.yalantis.com) Yalantis's presence on various platforms (LinkedIn, Twitter, Instagram, Facebook)
2. Yalantis recruiting process (including via recruiting platforms and websites)
3. Yalantis events (webinars, seminars, workshops, etc.), Yalantis schools (Python, QA, PM, Node.js, BA, etc.)

Yalantis only collects and processes the personal data that is necessary with respect to the specific purposes set up in advance.

### 2.3 2.3 Yalantis Website: [www.yalantis.com](http://www.yalantis.com) and Yalantis' presence on various social media platforms (LinkedIn, Twitter, Instagram, Facebook, etc.)

Data	Purpose	Legal ground	Storage period
name email phone number place of work or business name	business negotiations, to promote our services	Consent	5 years after the last interaction
name address email	NDA negotiations and concluding	1) Performance of a contract, 2) Legitimate interest	1) during the effect of NDA and 2) + 6 years
name, email for newsletter subscription	to promote our services	Consent	Until you withdraw consent
correspondence	business negotiations	Consent	10 years
self-made profile of a potential	business negotiations	Legitimate interest	5 years

email-receipt reports	business negotiations	Consent	1 year
browser information of a visitor	to enhance the quality of our products and solutions	Legitimate interest/ Consent	see details at Cookies Notice
IP address of the website form's applicant	to locate the country and city of the form's applicant	Legitimate interest/ Consent	Deleted after the session ends

## Browser information

When you access our website [www.yalantis.com](http://www.yalantis.com), we may collect standard Internet log information including your IP address, browser type, and language, access times. Please note that when you visit our website, you automatically submit information about your activities, usage, etc. on our website to Yalantis and third parties.

More detailed information on how we use cookies and other tracking technologies and how you can control these can be found in our [Cookies Notice](#).

## 2.4 Yalantis recruiting process (including via recruiting platforms and websites, social media websites)

Data	Purpose	Legal ground	Storage period
candidate's contact data (personal email, phone, messenger account)	hiring qualification process, background check, the establishment of engagement	Consent	3 years after last interaction with Yalantis/in case of engagement - 6 years after engagement end

correspondence	negotiations, hiring qualification process, background check, the establishment of engagement	Consent	3 years
candidate's address (city, country)	hiring qualification process, background check	Consent	3 years after the last interaction with Yalantis
candidate's CV copy	hiring qualification process, background check, the establishment of engagement	Consent	3 years/in case of engagement - 3 years after engagement end
candidate's personal ID documents copies	contract negotiations, relations formalization	1) Performance of a contract, 2) Legitimate interest	1) during agreement negotiations, during the effect of an agreement, 2) 6 years after the end of the effect of the signed agreement with Yalantis



candidate's personal financial documents copies or data (Tax ID, bank details)	contract negotiations, the establishment of engagement	1)Performance of a contract, 2) Legal obligation, 3) Legitimate interest	1) agreement negotiations, during cooperation (during the effect of the agreement with Yalantis) 2) 10 years after the end of the effect of the signed agreement with Yalantis 3) in case of non-cooperation - 1 month after the last interaction
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tests results	hiring qualification process, background check	Legitimate interest	6 months
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## 2.5 Yalantis events (webinars, seminars, workshops, etc.) and Yalantis schools (Python, QA, PM, Node.js, BA, etc.)

Data	Purpose	Legal ground	Storage period
registration data of participants of educational events(registration data and CV's)	event organization, promotion of other events, hiring qualification process	Consent	1-5 years after the event ended

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professional test / English test results of school candidate school	school organization and analytics, hiring qualification process	Legitimate interest	1 year after the test
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home tasks materials	school organization and analytics, hiring qualification process	Legitimate interest	3 years
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event feedback of a participant	school organization and analytics, hiring qualification process	Legitimate interest	3 years
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retrospective data about participant	school organization and analytics, hiring qualification process	Legitimate interest	5 years
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photos of an event with a person	school organization and analytics, promotion	1) legitimate interest 2) consent	1) 2 years after the event occurred 2) 8 years after the first 2 years passed
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video record of an event (may be made public)	school organization and analytics, promotion	Legitimate interest	5-6 years
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postal address	sending promotional materials	Consent	before the start of an event or within 2 months after the end of the event
Messenger account	communication after the event	Consent	1 year after the event ended

### 3. How long do we save the personal data

3.1 Yalantis retains personal data for as long as it is needed in relation to the purpose set for the processing and as indicated in this Notice. We are then obliged to delete them.

### 4. How we protect your personal data

4.1 We use a range of physical, electronic, and managerial measures to keep your personal data secure, accurate, and up to date. These measures include:

- education and training to relevant personnel so they are aware of our privacy obligations when handling personal data;
- administrative and technical controls to restrict access to personal data on a ‘need to know’ basis;
- technological security measures, including firewalls, encryption, and antivirus software; and
- physical security measures, such as personnel security passes to access our premises.

4.2 Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect personal data, but we cannot guarantee the security of data transmitted to us or by us over the Internet.

## 5. Who do we share your personal data with

5.1 Yalantis may share your personal data with certain third parties. When we share your personal data, we take all reasonable steps to ensure that your data is treated with an adequate level of protection and in accordance with applicable law.

### Who do we share your personal data with?

Information about third parties and their data protection policies:

Type	Name	Purpose of use
Analytics and tracking, marketing services, geolocation	<a href="#">Google</a> <a href="#">CrazyEgg</a> <a href="#">Microsoft Clarity</a> <a href="#">Leadfeeder</a> <a href="#">Pipedrive</a>	To track and analyze a site user's behavior (for more details please see Cookies Notice) To define the location of the website form's applicant To manage customers relations
Security services	<a href="#">Palo Alto</a>	To secure data transfer
Recruiting services	<a href="#">Cleverstaff</a> <a href="#">DOU</a> <a href="#">Djinni</a> <a href="#">Work.ua</a> <a href="#">Rabota.ua</a>	To hire personnel or to find contractors
Email services	<a href="#">Google</a> <a href="#">Yes ware</a>	To communicate
B2B platforms	<a href="#">Clutch</a>	To promote services

Social media services	<a href="#">Facebook</a> <a href="#">LinkedIn</a> <a href="#">Instagram</a> <a href="#">Twitter</a>	To communicate with the public, to promote services
File storage	<a href="#">Google</a> <a href="#">Atlassian</a> <a href="#">Slack</a>	To store data, to deliver software, to communicate
Communication services	<a href="#">Telegram</a> <a href="#">Slack</a> <a href="#">Zoom</a> <a href="#">Sonetel</a>	To communicate, to conduct the hiring qualification process, to conduct business negotiations
Content hosting	<a href="#">Youtube</a> <a href="#">Zoom</a>	To communicate with the public, to promote services, to conduct the hiring qualification process
Subscription for newsletters services	<a href="#">Reply.io</a>	To communicate directly with an audience
Testing services	<a href="#">Flexi Quiz</a>	To conduct the hiring qualification process
Web hosting	<a href="#">AWS</a>	To host the website

5.2 We may disclose information about you to authorities if we are obliged to do so according to law and authority decisions.

## 6. Your rights

Below is a list of the rights you have when Yalantis processes personal data about you and you are always welcome to contact us via form or by writing us at [privacy@yalantis.com](mailto:privacy@yalantis.com) if you wish to exercise any of these.

### 6.1 The right to be informed about the collection and use of your personal data.

The right to be informed allows you to know what personal data is collected and processed by Yalantis about you, why, how long it will be kept, and with whom Yalantis will share the data.

### 6.2. Right to obtain access to the personal data held about you

You have a right of access that gives you the possibility to obtain a copy of your personal data, as well as other supplementary information. It may help you to understand how and why Yalantis is using your data and check the lawfulness of the processing.

### 6.3. Right to ask for incorrect, inaccurate, or incomplete personal data to be corrected

The right to rectification allows you to ask Yalantis to update any inaccurate or incomplete data it has on you.

### 6.4. Right to request that personal data be erased when they are no longer needed or if the processing is unlawful

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. There are situations where Yalantis can decline the request. For instance, for reasons in compliance with legal obligations.

### 6.5. Right to request the restriction of the processing of your personal data in specific cases

You can request Yalantis to limit the use of your personal data in certain situations:

- If the data is inaccurate (during the verification process);
- If the processing is unlawful, but you do not want the data to be erased and requests restriction (which is different from the right to be erased);
- Yalantis no longer needs data, but you want the data to be preserved so the legal claim can be exercised;

Yalantis also may limit the processing of your data if Yalantis is taking measures to verify the data erasure request.

## **6.6 Right to receive your personal data in a machine-readable format and send them to another controller ('data portability')**

You have the right to data portability which gives you the right to receive your personal data processed by Yalantis in a structured, commonly used, and machine-readable format. It also gives you the right to request that Yalantis transmit those data directly to another controller.

## **6.7 Right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation**

You have the right to object to the processing of your personal data for marketing purposes at any time. You can also object to the processing of data on the grounds of legitimate interest.

## **6.8 Right regarding automated processing.**

You have the right not to be subject to automated decision-making if it is producing a legal effect that significantly affects you or not to be subject to profiling. Profiling means evaluating certain personal aspects relating to an individual that analyze or predicts aspects of behavior like performance at work, economic situation, health, personal preferences, interests, reliability, behavior, or location.

In the case of automated decision-making, you also have the right to express your point of view and challenge the decision.

## **6.9 Right to withdraw your consent at any time**

You have a specific right to withdraw consent. You have the right to withdraw your consent via form or by writing us at [privacy@yalantis.com](mailto:privacy@yalantis.com).

## **6.10 Right to lodge a complaint with a supervisory authority**

You have the right to submit a complaint to the Office of the Commissioner for Personal Data Protection, which is the Cypriot supervisory authority for our personal data processing and can be reached using the following details:

Office of the Commissioner for Personal Data Protection

Office address:

Iasonos 1, 1082 Nicosia, Cyprus

Postal address:

P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456

Fax: +357 22304565

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

Website: <https://www.dataprotection.gov.cy>

Member: Ms. Irene Loizidou Nikolaidou - Commissioner for Personal Data Protection  
You have also the right to lodge a complaint with a supervisory authority, in particular in [the Member State](#) of your habitual residence, place of work, or where violation of your rights has taken place.

## 7. Transfer of personal data to a third country

7.1 Yalantis always strives to only process your personal data within the EU/EEA. However, it happens that our contractors/vendors have all or parts of their operations in countries outside the EU/EEA (so-called "third countries"), usually, it may be Ukraine or/and USA. If the data is transferred outside the EU/EEA, we make sure that the data recipients are bound by data privacy responsibilities as stringent as those in force in the EU. To ensure this, we have or ensure the presence of an EU Commission Standard Contractual Clauses agreement or country adequacy decision in place with such data recipients.

## 8. Automated decisions (profiling)

Our third-party, Leadfeeder, collects behavioral data of all website visitors if they allow certain cookies to be used. Leadfeeder allows us to identify companies visiting our website for the purposes of further visitor profiling and customizing marketing efforts. To identify companies, Leadfeeder relies on publicly available information as well as data that is captured by default by Google Analytics. To increase visitor privacy, IP anonymization is enabled by default in Leadfeeder's tracker script, which means that Yalantis doesn't have access to the full IP data of its website users. Leadfeeder also enriches company information with contact data of individuals by referencing publicly available data sources. Leadfeeder's data partners for contact data include Hunter and Full Contact.

You can find out more about Leadfeeder's service and visitors' behavioral data that it uses at <https://www.leadfeeder.com/privacy-leadfeeder-contacts/>

You can always reject Leadfeeder processing by changing the cookies' privacy settings of your browser.

## 9. Verification

9.1 For certain personal data requests, we must first verify your identity before processing your request. To do so, we may ask you to provide us with your full name, contact information, and relationship to Yalantis. Depending on your request, we may ask you to provide additional information. Once we receive this information, we will



then review it and determine whether we are able to match it to the information Yalantis maintains about you to verify your identity.

## **10. Changes to our personal data notice**

Yalantis Privacy Notice will be updated on an ongoing basis so that it is always up-to-date. Above you can always find the date of the last updated version of this Notice.