

PRIVACY POLICY OF CODEST LTD. WEBSITE

This Privacy Policy explains how Codest Ltd., Office 303b, 182 -184, High Street North, E6 2JA London, United Kingdom. Company No. 12590542, VAT number: GB363431020 (the “**Controller**”, “**we**”, “**our**”) collects and processes personal data of individuals who use our website available at thecodest.co (the “**Website**”).

We process personal data in line with the General Data Protection Regulation (EU) 2016/679 (GDPR EU), the UK GDPR, and other applicable data protection laws. This Policy explains:

1. What personal data we collect and why
2. Cookies and similar technologies
3. How long we keep your data
4. Your rights
5. Who we share your data with
6. Data transfers outside the EEA and UK
7. Data security
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1. What personal data we collect and why

When you use our Website, we collect information that can identify you as a natural person. This may include your IP address, location data, online identifiers, and information collected through cookies, IP-Based Tracking or similar technologies.

1.1. Using the Website

We process your personal data to:

- 1) provide access to the Website and its services (legal basis: performance of a contract, Article 6(1)(b) GDPR),
- 2) analyse how the Website is used and improve its content (our legitimate interest, Article 6(1)(f) GDPR),
- 3) fix errors and improve Website functionality (legitimate interest, Article 6(1)(f) GDPR),
- 4) establish, exercise or defend legal claims (legitimate interest, Article 6(1)(f) GDPR),
- 5) carry out marketing of our own services (legitimate interest, Article 6(1)(f) GDPR),
- 6) display third-party or behavioural advertising, but only if we have your consent (Article 6(1)(a) GDPR).

Your Website activity is also stored in system logs (technical records of events within our IT system) for service provision, security, administration, and statistical purposes (legitimate interest, Article 6(1)(f) GDPR).

Providing your personal data is generally voluntary. However:

- A) some data are necessary to provide access to the Website or answer your inquiry (without them, we cannot deliver the service),
- B) data processed for analytics, improvements or marketing are not strictly necessary and you may object to their processing,

- C) consent-based data (e.g. for behavioural advertising) are always voluntary, and you can withdraw consent at any time without affecting past processing.

1.2. Contact forms

If you contact us via a form, we process the data you provide (such as name, email, message content):

- 1) to reply to your inquiry (performance of a contract, Article 6(1)(b) GDPR),
- 2) to create statistics of incoming requests and improve communication (legitimate interest, Article 6(1)(f) GDPR).

Providing required fields is necessary to handle your request. Other fields are optional.

1.3. Marketing & Newsletter

If you subscribe to our newsletter, we process your email address:

- 1) to deliver the newsletter (performance of a contract, Article 6(1)(b) GDPR),
- 2) to send marketing content, possibly tailored to your interests (legitimate interest, Article 6(1)(f) GDPR and your consent where required),
- 3) for statistical purposes to improve content (legitimate interest, Article 6(1)(f) GDPR),
- 4) to establish or defend legal claims (legitimate interest, Article 6(1)(f) GDPR).

You can withdraw your consent to marketing at any time.

1.4. Recruitment

If you apply for a role with us, we process your data:

- 1) to conduct the recruitment process and comply with employment law (Article 6(1)(b) and (c) GDPR),
- 2) to assess additional data provided voluntarily (consent, Article 6(1)(a) GDPR),
- 3) to keep applications for future recruitment with your consent (Article 6(1)(a) GDPR),
- 4) to establish or defend claims (legitimate interest, Article 6(1)(f) GDPR).

Providing required data is necessary to participate in recruitment. Other data is voluntary.

2. Cookies and similar technologies

We use cookies (small text files stored on your device when you browse the Website) and similar technologies on our Website to make your experience better and to provide essential services. Here's a breakdown:

2.1. Essential cookies

Necessary to make the Website work properly. This includes security, login, and multimedia playback.

Essential cookies are necessary and it is not possible to use our Website without them. Therefore, you cannot manage them in your browser or withdraw any consent or permission for them.

2.2. Analytics cookies

Help us understand how the Website is used, so we can improve content and functionality. For analytics purposes we are using third party cookies as follows:

- 1) Google Analytics (Google LLC) – tracks how users interact with the Website to create statistics and reports,
- 2) Google Search Console (Google LLC) – for statistical purposes, traffic monitoring, error tracking, and Website optimisation,
- 3) Clarity (Microsoft Corp.) – analyses user behaviour and helps optimise the Website,
- 4) HubSpot (HubSpot, Inc.) – analyses user behaviour and Website performance.

You can manage analytics cookies in your browser settings or withdraw the appropriate consent or permissions at any time. Please notice, that blocking cookies may affect some Website features.

2.3. Marketing cookies

Used to personalise ads and marketing content. For marketing purposes we are using third party cookies as follows:

- 1) Google Ads / Adwords (Google LLC) – display ads on websites you have visited,
- 2) Facebook Ads (Facebook Inc.) – advertising and remarketing,
- 3) LinkedIn Ads (LinkedIn Corporation) – advertising and remarketing,
- 4) Lead Forensics (Lead Forensics Ltd.) – identifies companies visiting our site based on corporate IPs,
- 5) Dealfront (Dealfront Group GmbH) – identifies companies visiting our site based on corporate IPs.

You can manage marketing cookies in your browser settings or withdraw the appropriate consent or permissions at any time. Please notice, that blocking cookies may affect some Website features.

2.4. Social Media Tools:

The Website uses plugins and other social tools from Facebook, LinkedIn and Clutch. When you visit the Website, your browser connects directly to these social networks' servers. They receive information that you visited the Website (including your IP address). If you are logged in to a social network, your visit may be linked to your profile there.

3. Who we share your data with

We may share your data with:

- 1) IT and hosting providers,
- 2) providers of analytics, marketing, and recruitment tools,
- 3) legal, tax, or archiving service providers,
- 4) public authorities where required by law.

If you consent, we may share your data with other entities for their own marketing purposes.

4. Data transfers outside the EEA and UK

Some of our providers are outside the EEA or UK. We transfer data only with appropriate safeguards, such as adequacy decisions, Standard Contractual Clauses, or Binding Corporate Rules.

5. How long we keep your data

We store personal data and use cookies only as long as necessary for the purposes described.

5.1. Personal data retention

We retain your personal data only as long as necessary for the purposes for which it was collected:

- 1) **for the performance of the services** – including access to the Website and its functionalities, for the entire duration of the agreement, and, where applicable, until you withdraw your consent or object to processing,
- 2) **for recruitment purposes** – up to 2 years, or up to 3 years if you have consented to be considered for future recruitment,
- 3) **for newsletters and direct marketing** – personal data is kept for the duration of your subscription and until you withdraw your consent,
- 4) **for indirect marketing and analyses** – personal data is kept in accordance with legitimate interest until you object to processing, but never longer than 36 months,
- 5) **for legal claims and security purposes** – personal data may be retained longer if required by law or to establish, exercise, or defend legal claims.

After the retention period, all personal data is deleted or anonymised.

5.2. Cookies retention

Retention of cookies depends on the type:

- A) **session cookies (essential)** – deleted after you close your browser. These are necessary for core Website functions, like security, login, and multimedia playback
- B) **persistent cookies (analytics and marketing)** – remain on your device for up to 36 months, depending on the provider. These help us understand Website usage, improve functionality, and personalise marketing content.

However, you can manage or block cookies in your browser settings, or withdraw consent at any time. **Please note that blocking essential cookies may affect some Website features.**

6. Your rights

You have the right to:

- 1) **access** – you can ask us for a copy of your personal data and information about how we process it,
- 2) **rectification** – you can ask us to correct inaccurate or incomplete personal data,
- 3) **erasure (“right to be forgotten”)** – you can request deletion of your personal data where allowed by law,
- 4) **restriction** – you can ask us to temporarily limit how we use your data, for example while we check an objection or a request to correct it,
- 5) **objection:**
 - a. you can object at any time to direct marketing,
 - b. in other cases, you may object if your specific situation justifies it,
- 6) **data portability** – you can ask to receive the data you provided to us in a machine-readable format, or to have it transferred to another provider,

- 7) **withdraw consent** – if we process your data based on consent (e.g. behavioural advertising, newsletter), you can withdraw it at any time. This does not affect processing carried out before withdrawal,
- 8) **lodge a complaint** – you can file a complaint with your national supervisory authority in the EU or with the Information Commissioner's Office (ICO) in the UK.

7. Security

We care deeply about the security of your personal data and take every step to protect it. Access is limited to authorised people, all actions are logged, and we are following strict other security measures. We also ensure our Privacy Policy stays updated (last update had place on September 22, 2025).

8. How to contact to us

If you have any questions or concerns about your personal data you can contact us by email: contact@thecodest.co or by traditional post:

- A) from UK: Office 303B, 182-184 High Street North E6 2JA, London, England
- B) from EU: Fabryczna Office Park, Aleja Pokoju 18, 31-564 Kraków or Brain Embassy, Konstruktorska 11, 02-673 Warsaw, Poland.