

Privacy Notice

Sun One

Last updated: **May 2022**

Intro

We in **Smart Solutions** take care of your (“you”, “user” or “data subject”) personal data and do everything possible to protect it.

This Privacy Notice is written to help you understand how your personal data is collected, stored and used and what happens to it when you use our [website](#) (“**website**”) and its [subdomain](#) (“**subdomain**”).

Please note! This Notice does not cover recruiting data, but does cover B2B relationships

This Privacy Notice is our (data controller) statement to you that describes how we collect, use, retain and disclose personal data.

For us, you can be:

Data subject	Description
Visitor	User, who researches the website
Staff	User, who clicked “Go to staff tool”
Client	Users, who fill out our forms

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Who we are

Data controller	SUN ONE PERSONAL, registration code: 43561521
Address	49000, Ukraine, Dnipro, Lipinsky Str., building 7
Email	privacy@sunone.com.ua — for privacy questions
	info@sunone.com.ua — for general questions
EU representative	privacy@sunone.com.ua

Personal data we process

The data we process is divided into categories: technical data, data provided to us by the users and data obtained from third parties.

[technical data](#)

[data provided by users](#)

[data obtained from third parties](#)

Pay attention! We do not knowingly process personal data of visitors under the age of 16 without consent from a legal representative(s). If you are such a visitor or the legal representative of the visitor, please let us know by email: privacy@sunone.com.ua.

Technical data

When you visit our website, some data is collected automatically.

Data we collect	Reason for data collection
IP address, UTM parameters, geolocation, device type, browser type, cookies, User-agent, User ID and data about your interaction with the website - session ID.	The smooth operation of our website

Session ID is your interaction with a website, a website's name from which you came to our website, the features you use, the pages used on our website, how you use our website and the actions you take if any.

Data provided by users

We collect data when	Personal data	Legal basis	Reasons for processing
Visitor			
You use our website	• Technical data; • Necessary cookies.	Legitimate interest	Website operation
You use our website	• Marketing cookies; • Statistics cookies; • Preference cookies.	Consent	Website operation; Analytics; Statistics.
Period of storage			
Data processed on the basis of a legitimate interest		Stored for up to 2 years after the last use of the website	
Data processed on the basis of consent		Stored for up to 2 years from the last time you used the website or until you withdraw your consent	
Period of storage			
Data processed on the basis of performance of the contract		Stored for the duration of use of our service + 3 years	
Client			
You click «Get a job», «Apply»	• Name; • telephone number; • email.	Legitimate interest	Provide a service
You fill in the «Callback» form	• Name; • company; • telephone number; • email.	Performance of the contract	Provide a service
You fill in «Discuss your project» form	• Name; • telephone number; • email.	Performance of the contract	Provide a service
You fill in «Find a job» form	• Name; • telephone number; • city;	Legitimate interest	Provide a service

	• age; • experience; • email.		
You fill in «Write to the director» form	• Name; • telephone number; • email; • your message.	Legitimate interest	Provide a service
You fill in «Write to us» form	• Name; • email; • your message.	Legitimate interest	Provide a service
You fill in «Become a partner» form	• Name; • telephone number; • city.	Legitimate interest	Provide a service
Period of storage			
Data processed on the basis of performance of the contract		Stored for the duration of use of our service + 3 years	
Data processed on the basis of a legitimate interest		Stored for the duration of use of our service + 3 years OR until you want to delete the feedback	
Please note! You can exercise your right to delete your data. In this case, we will delete your data from our servers within 30 days of your request.			

Data obtained from third parties

Also, we can **collect some data from third parties**. The scope of the data collected, the purposes and the legal basis for the processing is determined by the respective privacy documents of these parties:

Third parties	Description	Link to privacy documents
Facebook	We use Facebook for marketing	Privacy Policy
Google Analytics	We use Google Analytics for statistics and analytics	Safeguarding your data

Twitter	We use LinkedIn for communication and support	Privacy Policy
Facebook	We use Facebook for communication and support	Privacy
LinkedIn	We use LinkedIn for communication and support	Privacy Policy
Telegram	For communication and support	Privacy Policy
YouTube	We use Youtube for publishing video about us	YouTube Privacy Controls

Please note! We use a large number of third parties to provide services to you, and this list may change periodically. If you want to see the full list, please write to us at privacy@sunone.com.ua. We guarantee that we take all necessary measures to protect your data.

Data transfer

General

We use your personal data to perform a contract and for communication between the users and us.

Also, we transfer your data on the following grounds:

Consent. We transfer your personal data based on your explicit consent.

Compliance with the law. We will disclose your personal data to third parties to the extent that it is necessary:

- to comply with a government request, court order, or applicable law;
- to prevent unlawful use of our website or violation of the Terms and Conditions of our website and our policies;
- to protect against claims of third parties;
- to help prevent or investigate fraud.

Legitimate interest or performance of the contract. We transfer your personal data to third parties based on a public offer for processing on our behalf, subject to technical and organizational measures to protect your personal data.

Business transfers. We will transfer your data between Smart Solutions companies and between structural departments of Smart Solutions. We will also transfer data to individual controllers in the context of service provision and to the extent strictly necessary to provide it.

Transfer of data outside the European Economic Area

The personal data we collect is stored on our servers in Germany. The data is processed in Ukraine. There is no decision on adequacy by the European Commission. If we need a data transfer, we will take necessary steps to protect it. We will transfer your personal data outside the EEA to provide service with all appropriate safeguards to protect your personal data.

In addition, we use technical, administrative and physical security measures to protect against the loss and misuse of information under our control. However, if a data transfer is required to perform a contract or to provide you services, we have the right to do so without your consent.

Please note! We do not plan to transfer your data outside the EEA by default.

Data protection

We protect the information on computer servers in a controlled secure environment that is protected from unauthorized access, use or disclosure. We take reasonable administrative, technical and physical security measures for protection.

More about our protection measures:

Physical protection measures	
Video surveillance	Limited access to premises
Signaling	24/7 security
24/7 system administrators duty	Fire extinguishing system
Technical protection measures	
Two-Level Authentication	Backup
Firewalls	Encryption technologies
Organizational protection measures	
Staff training	Non-disclosure agreements
Internal policies and instructions	Transmission protection

Your privacy rights

You, as a data subject, have the right to interact with your data directly or through a request to us. This section describes these rights and how you can exercise them:

Right	Description
The right to access	You can request an explanation of the processing of your personal data
The right to portability	You can request all the data that you provided to us, as well as request to transfer data to another controller
The right to restrict processing	You may partially or completely prohibit us from processing your personal data
The right to file complaints	You can file a complaint to the regulatory body
The right to be forgotten	You can send us a request to delete your personal data from our systems unless there is a legal requirement to keep it
The right to withdraw consent	For data that you have previously consented to, you can always withdraw your consent, and we will stop processing it
Please note! We may ask you to verify your identity before responding to a request.	

To exercise your rights, write us an email at privacy@smart-hr.com.ua. We will answer you as soon as possible.

If we do not satisfy your request, you can file a complaint to the regulatory body:

- for Ukrainians: Ukrainian Parliament Commissioner for Human Rights by email hotline@ombudsman.gov.ua or write a letter: 21/8, Instytutska Str., Kyiv-08, 01008.

The use of cookies

We process technical data and use cookies. You may find our Cookies Policy [here](#).

If you want to disable cookies, you can find instructions for managing your browser settings at these links:

[Internet Explorer](#)

[Microsoft Edge](#)

[Chrome](#)

[Vivaldi](#)

[Firefox](#)

[Safari](#)

[Opera](#)

Update

This Privacy Notice and the relationships falling under its effect are regulated by the GDPR and Law of Ukraine "On Protection of Personal Data".

Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on our website.

If significant material changes are made that affect your privacy and confidentiality, we will notify you by email or display information on the website and ask for your consent.