

## **Rules concerning the processing of Personal Data at the Company**

The present document describes the rules of processing and protection of Your Personal data that we collect for the purpose of one objective or a greater number of objectives, described below.

The present document is informative.

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### **1. Definitions**

1) Personal Data Controller (Controller) – a natural or legal person, a public authority, a body or another entity that determines independently or jointly with others the purposes and modes of Processing of Personal Data; of the objectives and modes of such Processing are determined within EU law or the law of the member state, then EU or member state law may designate the Controller or specific criteria for their determination.

2) Personal Data (Data) – all kinds of data about an identified or identifiable natural person ('concerned person'); an identifiable natural person is any person who may be directly or indirectly identified, in particular on the basis of identifiers such as the first and last name, identification number, location data, on-line identifier or any particular detailed describing the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

3) Commercial Information – any piece of information directly or indirectly meant to promote goods, services or the image of an entrepreneur or a person performing a profession, whereby their right to operate within that profession is determined on the fulfilment of requirements set forth in separate acts of law, excluding information allowing communication by electronic means with a specific person, and any information about goods and services that is not used to achieve a trade or commercial effect required by the entity contracting its distribution, in particular without remuneration or any other advantages from producers, retailers and service providers.

4) Customer

a) a natural person possessing full capacity to perform legal activities, and in cases foreseen by commonly applicable provisions of the law, also a natural person possessing limited capacity to perform legal activities,  
b) a legal person,  
c) an organisational entity without legal personality, by law provided with legal capacity,  
who had concluded or is looking to conclude a contract of sale with the Service provider, and one who uses or is looking to use an Electronic Service.

5) Business Partner

a) a natural person possessing full capacity to perform legal activities, and in cases foreseen by commonly applicable provisions of the law, also a natural person possessing limited capacity to perform legal activities,  
b) a legal person,  
c) an organisational entity without legal personality, by law provided with legal capacity,  
who uses the services and products offered by the Controller, but also a supplier, subcontractor,

6) Newsletter – An Electronic Service, provided by the Service Provider by way of electronic mail, which allows all persons using it to subscribe to and automatically receive by electronic means regular, cost-free information e. g. about new products, special offers, including Commercial Information.

7) Supervisory Body – The Chairman of the Polish Data Protection Office.

8) Processing – an operation or a set of operations performed on Personal Data or sets of Personal Data in an automated or non-automated manner, such as collection, saving, organising, ordering, storage, adaptation or modification, downloading, browsing, usage, disclosure by transmission, distribution or any other form of provision, adaptation or fusion, limitation, deletion or destruction.

9) GDPR: Regulation (EU) 2016/ 679 of the European Parliament and of the Council of April 27<sup>th</sup>, 2016, 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).

## 2. Personal Data Controller

The Personal Data Controller, in the meaning used by the Regulation (EU) 2016/ 679 of the European Parliament and of the Council of April 27<sup>th</sup>, 2016, 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) of April 27<sup>th</sup>, 2016 (OJEU L no. 119, p. 1), referred to in the text as the GDPR, is the company Digitree Group S.A., with seat in Rybnik, Poland, address Raciborska 35a, 44-200 Rybnik, NIP (tax id.) no.: 642-28-84-378, KRS (court reg.) no.: 0000369700, REGON (stat.) no.: 240018741, referred to in the text as the Controller.

The Controller had appointed a personal data protection inspector: [iod@digitree.pl](mailto:iod@digitree.pl).

## 3. Document target group

The Privacy Policy is addressed to You if e. g.

- 1) You are a Customer making use of the services and products offered by the Controller,
- 2) You are a Business Partner of the Controller,
- 3) You represent a Business Partner, being a natural person acting in name of the Business Partner, or a contact person for the Business Partner, including in particular their employee or co-worker,
- 4) You are making contact with us by phone or text message, by e-mail, through the contact form available as part of our website, using other means of electronic communication, traditional post, or in case it is the Controller who is contacting You in this manner,
- 5) You are a candidate for employment,
- 6) You are subscribers of our Newsletter or recipients of other marketing or commercial materials.

#### **4. Offer submission and contract conclusion – information obligation**

1) The Controller may collect Personal Data of Customers for the purpose of conclusion of a contract, in order to undertake activities before the conclusion of the Contract (e. g. as part of negotiations, offer submission, preparing cost estimates).

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter b of the GDPR – Processing is necessary for the purpose of implementation of the contract concluded with the concerned person, or in order to undertake activities to conclude it.

b) art. 6 section 1 letter c of the GDPR – in relation to the necessity of fulfilment of a legal obligation binding the Controller, pursuant to tax provisions and accounting provisions concerning the Personal Data contained in tax or bookkeeping documentation.

c) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against possible claims, communication and execution of marketing activities.

3) The Controller will Process Your Personal Data until the expiry of the Contract, and thereafter for a period of five years counting from the end of the year, in which the tax obligation arises, for bookkeeping and tax purposes, and after this time until the statute of limitations of claims from the contract on the provision of services. The statute of limitations is six years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years. In case of implementation of marketing activities, the Controller will Process Your Personal Data until the time of submission of an effective decline.

4) The provision of Personal Data is a condition of conclusion and implementation of the contract concerning the provision of services. The provision of the Data is voluntary, however, failure to provide data results in the inability to conclude and/ or implement the specific contract.

5) The Controller hereby informs that the recipients of Your Personal Data are:

a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, service quality testing, assertion of receivables, auditing our activity,

b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,

c) electronic payment system providers and banks for the purpose of execution of payments,

d) postal operators, delivery services,

e) our commercial partners, entities participating in the execution of the specific contract.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

#### **5. Handling complaints and submissions – information obligation**

1) The Controller may collect Personal Data for the purpose of responding to complaints or submissions.

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter c of the GDPR – Processing is necessary to fulfil a legal obligation binding the Controller.

b) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against possible claims and execution of communication activities.

3) The Controller will Process Your Personal Data over the period of the complaints procedure or over the period of the procedure related to a complaint/ submission (up to 30 days maximum), and in case of raising of further claims related to the complaint or submission – until the expiry of the statute of limitations of these claims. The statute of limitations is six years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years.

4) The provision of Personal Data is a condition of receiving a response to a complaint or submission. The provision of the Data is voluntary, however, failure to provide data results in the inability to receive a response to the complaint or submission.

5) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, service quality testing, assertion of receivables, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) postal operators, delivery services,
- d) entities participating in the execution of the specific contract.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **6. Responding to inquiries and fulfilment of obligations related to the protection of Personal data – information obligation**

1) The Controller may collect Personal Data for the purpose of responding to submitted requests (e. g. concerning access to Data, removal of Data, correction of Data), and for the purpose of fulfilment of other legal obligations binding the Controller, and stemming from the Data Protection law (e. g. processing of Personal Data in relation to violations, etc.).

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter c of the GDPR – Processing is necessary to fulfil a legal obligation binding the Controller pursuant to the GDPR.

b) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against possible claims.

3) The Controller will Process Your Personal Data over the period of communication in relation to the submitted request or violation, and thereafter until the expiry of the period required for the establishment, assertion or defence of claims. The statute of limitations is six years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years.

4) The provision of Personal Data is voluntary but necessary in order to communicate with respect to the request. Failure to provide Data results in the inability to conduct communications.

5) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing legal services, service quality testing, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) postal operators, delivery services,
- d) entities participating in the execution of the request.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **7. Conformity with tax obligations – information obligation**

1) The Controller may collect Personal Data for the purpose of fulfilment of legal obligations binding the Controller pursuant to tax law (issuing invoices, keeping accounting documentation, making payments, etc.).

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter c of the GDPR – Processing is necessary to fulfil a legal obligation binding the Controller pursuant to tax provisions and accounting provisions with respect to Personal Data included in tax or accounting documentation.

b) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against possible claims.

3) The Controller will Process Your Personal Data over the period of five years starting from the end of the year, in which the deadline passes for the payment of taxes for the preceding year, or until the expiry of the statute of limitations for claims. The statute of limitations is six years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years.

4) The provision of Personal Data is obligatory due to the necessity of the Controller to fulfil the tax obligations binding them.

5) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, claim assertion, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) electronic payment system providers and banks for the purpose of execution of payments
- d) postal operators, delivery services.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **8. Establishment and assertion of claims, as well as defence against claims – information obligation**

1) The Controller may collect Personal Data for the purpose of establishment, assertion of or defence against claims.

2) The Data shall be Processed on the basis of art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against claims, archiving of correspondence for the purpose of exhibiting its course in the future.

3) The Controller will Process Your Personal Data until the expiry of the period necessary to establish, assert or defend against claims. The statute of limitations is six years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years.

4) The provision of Personal Data is obligatory due to the necessity of the Controller to fulfil the tax obligations binding them.

5) The Controller hereby informs that the recipients of Your Personal Data are:

a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, marketing services, service quality testing, claim assertion, auditing our activity,

b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,

c) electronic payment system providers and banks for the purpose of execution of payments,

d) postal operators, delivery services,

e) our commercial partners, entities participating in the execution of the specific contract.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **9. Worker recruitment – information obligation**

1) The Controller may collect the Personal Data of employment candidates for the purpose of recruitment.

2) The Personal Data shall, within the scope indicated in the provisions of Polish labour law, meaning, art. 22<sup>1</sup> of the Polish act of June 26<sup>th</sup>, 1974, the Polish Labour Code (Polish Journal of Laws of 2020, item no. 1320, as amended) (the PLL), and in the Regulation of the Polish Minister of Family, Labour and Social Policy of December 10<sup>th</sup>, 2018, on employee documentation (Polish Journal of Laws of 2018, item no. 2369), be Processed for the purpose of execution of the current recruitment proceedings.

The Basis for the processing is art. 22<sup>1</sup> par. 1 p. 4-6 of the PLL in relation to art. 6 section 1 letter b of the GDPR.

For Data described in art. 22<sup>1</sup> par. 1 p. 1-3 of the PLL the Basis for the Processing is art. 6 section 1 letter c of the GDPR.

The provision of other Data within the scope not described in the legal provisions shall be treated as consent to the Processing of this Personal Data. The expression of consent in this regard is voluntary, and any consent given in this manner may be withdrawn at any time.

The basis for the Processing is art. 6 section 1 letter a of the GDPR, and in case of Personal Data of special categories – art. 9 section 2 letter a of the GDPR.

3) Your Personal Data may be Processed, including in course of further employee recruitment drives, if You give Your consent to this, which consent may be withdrawn at any time.

The basis for the Processing is art. 6 section 1 letter a of the GDPR.

4) The Controller will Process Your Personal Data until the conclusion of the recruitment proceedings or until the candidate resigns from vying from the position, unless the candidate consents to the Processing of their Personal Data for the needs of future recruitment drives. Should consent have been expressed to the usage of Personal Data for future recruitment drives, the Data will be utilised for nine months.

5) The provision of Personal Data within the scope of art. 22<sup>1</sup> of the Polish Labour Code is necessary to participate in the recruitment process. The provision of any other kinds of Personal Data is voluntary.

A consequence of the failure to provide necessary Data shall be the inability to participate in the recruitment process.

6) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing legal services, analysis services, service quality testing, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) postal operators, delivery services,
- d) recruitment agencies, recruitment system providers.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **10. Employee recruitment – information obligation**

1) The Controller may collect the Personal Data of candidates for cooperation for the purpose of recruitment.

2) The Personal Data shall be processed for the purpose of execution of the current recruitment process. The basis for the Processing is art. 6 section 1 letter b of the GDPR.

3) Your Personal Data may be Processed, including in course of further cooperation recruitment drives, if You give Your consent to this, which consent may be withdrawn at any time. The basis for the Processing is art. 6 section 1 letter a of the GDPR.

4) The Controller will Process Your Personal Data until the conclusion of the recruitment proceedings or until the candidate resigns from vying from the position, unless the candidate consents to the Processing of their Personal Data for the needs of future recruitment drives. Should consent have been expressed to the usage of Personal Data for future recruitment drives, the Data will be utilised for nine months.

5) The provision of Your Personal Data is voluntary.

6) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing legal services, analysis services, service quality testing, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) postal operators, delivery services,
- d) recruitment agencies, recruitment system providers.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **11. Handling correspondence, customer contact – information obligation**

1) The Controller may collect the Personal Data of Customers and other persons contacting the Controller within broadly understood Customer service, which Personal Data are necessary to follow through with pleas and to contact the Customer in order to provide a response. Contact is possible by phone or text message, by e-mail, via the contact form available on our website, by other means of electronic communication and by regular post.

2) The Data shall be Processed on the basis of art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are: contact with You and archiving of any correspondence for the purpose of exhibiting its course in the future. If contact leads to the conclusion of a contract, then the Data will be Processed on the basis of art. 6 section 1 letter b of the GDPR.

3) The content of correspondence may be archived. If it is archived, then it will be stored until the expiry of the statute of limitations for claims that might possibly arise in connection to the correspondence. The statute of limitations is six or ten years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years.

4) The provision of the Data is voluntary, yet necessary to make contact with us. A consequence of the failure to provide the Data is lack of possibility of contact.

5) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, service quality testing, claim assertion, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) postal operators, delivery services,
- d) entities participating in the execution of the specific contract.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **12. Organisation of events, conferences, etc. – information obligation**

1) The Controller may collect Personal Data for the purpose of organisation of events or conferences.

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter b of the GDPR – Processing is necessary for the purpose of execution of the contract concerning the participation in the event/ conference concluded with the concerned person, or in order to undertake activities to conclude it.

b) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against possible claims.



3) The Controller will Process Your Personal Data until the expiry of the Contract concerning the participation in the event/ conference, and thereafter for a period of five years counting from the end of the year, in which the tax obligation arises, for bookkeeping and tax purposes, and after this time until the statute of limitations of claims from the contract concerning the participation in the event/ conference. The statute of limitations is six or ten years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years.

4) The provision of Personal Data is a condition of conclusion and implementation of the contract concerning the participation in the event/ conference

The provision of the Data is voluntary, however, failure to provide data results in the inability to participate in the event/ conference.

5) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, marketing services, service quality testing, assertion of receivables, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) electronic payment system providers and banks for the purpose of execution of payments,
- d) postal operators, delivery services,
- e) our commercial partners, entities participating in the execution of the specific contract.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

### **13. Organisation of competitions – information obligation**

1) The Controller may collect Personal Data of Customers for the purpose of organisation of competitions (services) on the basis of rules described in the terms of the specific competition, including for the purpose of correct operation of the competition, to determine the winners and award the competition prizes.

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter b of the GDPR – Processing is necessary for the purpose of implementation of the contract or in order to undertake activities to conclude it.

b) art. 6 section 1 letter c of the GDPR – Processing is necessary in relation to the necessity of fulfilment of a legal obligation binding the Controller, pursuant to tax provisions and accounting provisions.

c) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the establishment, assertion and defence against possible claims.

3) The Controller will Process Your Personal Data for the purpose of execution of the competition and in relation to activities undertaken in connection to its organisation, until the time of conclusion of the competition, determination of the winners and awarding of the prizes, and until the time of expiry of the statute of limitations for claims stemming from the organisation of the competition. The statute of limitations is six years, and for claims concerning periodic services and claims related to the operation of a business – three years. However, the expiry of the statute of limitations falls on the last day of the calendar year, unless the statute of limitations is shorter than two years, and in relation to the necessity of tax settlements – over the period of five years starting from the end of the year, in which the deadline passes for the payment of taxes for the preceding year.

4) The provision of Personal Data is voluntary, however, failure to provide Personal Data results in the inability to participate in the competition.

5) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing accounting services, legal services, analysis services, marketing services, service quality testing, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) electronic payment system providers and banks for the purpose of execution of payments,
- d) postal operators, delivery services,
- e) our commercial partners, entities participating in the competition procedure.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

#### **14. Own marketing – sending out marketing and commercial information, the newsletter – information obligation**

1) The Controller may collect Personal Data for the purpose of sending out the newsletter or marketing and commercial information.

2) The Data shall be Processed on the following basis:

a) art. 6 section 1 letter a of the GDPR – the Concerned Person consented to the Processing of their Personal Data, and

b) art. 6 section 1 letter f of the GDPR – Processing is necessary for purposes stemming from legally substantiated interests of the Controller, which are the sending of the Newsletter or marketing information and Commercial Information and defence against any complaints that might arise in connection to the transmission of mass mailing.

3) With respect to the information that might also constitute Personal Data, and which does not originate directly from You but was collected automatically by the Newsletter mailing system or the system to send out marketing information and Commercial Information, we Process Your Personal Data on the basis of a legally justified interest (pursuant to art. 6 section 1 letter f of the GDPR), which is working towards the improvement of our activities and showing, if necessary, which link from the Newsletter, the marketing information or Commercial Information was clicked by You.

4) Should the basis for the Processing be Your consent to receive Commercial Information or the Newsletter, it may be withdrawn at any time pursuant to Your motion submitted by e-mail or using the link provided in every mailing message we send. The Personal Data will be Processed until the effective submission of a complaint or until the achievement of the objective of the Processing, and in case of expression of consent – until that consent is withdrawn.

5) The provision of Personal Data is voluntary. Failure to provide it shall be the impossibility to receive the Newsletter, marketing information and Commercial Information.

6) The Controller hereby informs that the recipients of Your Personal Data are:

- a) entities supporting us in the operation of our business by our mandate, in particular: IT system suppliers, companies providing legal services, analysis services, marketing services, service quality testing, auditing our activity,
- b) providers of cloud computing services, where files are stored, where Your Personal Data may be kept,
- c) suppliers of mass mailing transmission systems,
- d) our commercial partners.

Your Personal Data may also be transferred to other entities, should such an obligation stem from commonly valid provisions of the law or binding decisions/ orders of courts of law, such as e. g. to courts, prosecutor offices, tax offices.

## **15. Rights of concerned persons**

You have the following rights:

- a) right to access the Personal Data (e. g. You may receive from the Controller a confirmation as to whether Your Personal Data is being Processed by us or not; if so, You have the right to request access to them and to obtain information related to their processing, for instance, the objective of Processing, the recipients or categories of recipients of Personal Data, the planned period of storage of the Data or the criteria of determination of this period, etc.),
- b) right to correct the Data (e. g. amend it, correct it, update it),
- c) right to complain against the Processing of Your Personal Data (You have the right to complain at any time – for reasons related to Your specific situation – against the Processing of Your Personal Data based on the Processing that is necessary for purposes stemming from legally justified interests of the Controller, including profiling, on the basis of these provisions. In such a situation, the Controller shall cease the Processing of Your Personal Data, unless they would be able to show legally justified grounds for the Processing that would supersede Your interests, rights and freedoms, or if the Processing of this Data would be necessary for the purpose of establishment, assertion of or defence against legal claims;

You are entitled to submit, at any time, a complaint against the Processing of Your Personal Data for the purpose of direct marketing, which includes profiling within the scope related to such direct marketing,

- d) right to have the Processing of Your Personal Data limited  
(this is possible in each of the following cases:

- You question the correctness of Your Personal Data,
- the Processing is unlawful, and You demand a reduction of the scope of Processing instead of the removal of Data,
- the Controller does not need Your Personal Data any more, but You need them to make use of defence or legal claims,
- You oppose the processing of Personal Data, and the Controller is verifying the justifiability of Your complaint),

- e) right to transfer Your Personal Data  
(if

- the processing is taking place on the basis of a consent or on the basis of a contract, and
- if the processing of the Personal Data is being conducted automatically,

then You are entitled to receive the Personal Data that You provided to the Controller in a structured, commonly used machine-readable format, and You are entitled to send this Personal Data to any other Controller without interference on our part)

f) right to have the Data removed (however, only in situations described by the provisions of the GDPR, e. g. if Your Personal Data is not necessary for purposes, for which they were collected, or Processed in any other way, or if they were Processed unlawfully),

g) right to withdraw consent (the Consent may be withdrawn at any time, without influence on the legality of Processing that was performed on the basis of the consent before it was withdrawn; it is not necessary to provide justification of the withdrawal of the consent),

h) right to complain to a supervisory authority (the Chairman of the Polish Data Protection Office, at the address: Polish Data Protection Office, Stawki 2, 00-193 Warsaw, Poland, e-mail: iod@uodo.gov.pl).

#### **16. Transfer of Data to third countries and international organisations, decision automation**

1) Your Data will not be transferred to third countries or international organisations.

2) Your Personal Data will not be subjected to any mechanism of automated decision-making, including profiling.

#### **17. Changes to Data Processing regulations**

1) In the future, there may arise the need to introduce changes to or to amend the present document. This may become necessary in particular due to changes in binding provisions of the law concerning protection of Personal Data, guidelines concerning the protection of Personal Data issued by the supervisory body (Chairman of the Polish Data Protection Office), but also in relation to any possible changes in the Controller's business or the Customer and Business Partner service processes.

2) The Controller guarantees that any changes to this document that may arise in the future shall remain in full agreement with valid provisions of the law in terms of protection of Personal Data, and will also take into account the necessity to ensure the security of Your Personal Data as Processed by the Controller.

3) An information on changes to the Rules shall be provided on the website managed by the Controller not later than within seven days before the updated version of the Rules would enter into force.

**Rules concerning the processing of personal data last updated on 01.12.2022.**