

## PERSONAL DATA PROTECTION POLICY

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Dear Sir or Madam,

our entire team appreciates your trust and the fact that you have entrusted us with your personal data. We attach great importance to personal data protection, so this document contains all information regarding the processing of your personal data in accordance with Article 13 acts (1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and your related rights.

The controller of your personal data is EXTRAL SP. Z O.O., with its registered office in Żory at ul. Wygody 2 (44-240 ŻORY) (KRS 0000294931, NIP: 534 23 75 148, REGON: 141217747) (hereinafter referred to as "DPO").

In all matters relating to the processing of your personal data, you can contact us:

- by mail to the company address given above,
- by e-mail to the address: [iod@extral.com](mailto:iod@extral.com)

To better communicate with us, we have appointed a Data Protection Officer, Ms. Bożena Krawczuk, available at: [iod@extral.com](mailto:iod@extral.com)

We will endeavor to respond to your questions as quickly as possible. However, we will always respond within 7 days, unless the issue proves more complex, in which case we will respond within 30 days. We would like to inform you that we apply organizational, technical, and legal measures required by current data protection regulations to prevent unauthorized access and modification of your personal data processed by the Controller in any form, especially data sent to us electronically.

### 1. Personal data

By definition, personal data means any information relating to an identified or identifiable natural person ("data subject") who can be identified directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or image.

### 2. The purpose of personal data processing

Your personal data will be processed:

- for purposes arising from the conducted business activity and described in detail in separate clauses.

We process personal data based on authorization under applicable law (Article 6, Section 1, Letter c of the GDPR), to the extent necessary to perform our activities and fulfill the contract (Article 6, Act 1, Letter b of the GDPR), and based on your consent (Article 6, Act 1, Letter a of the GDPR). While providing your personal data for this purpose is always voluntary, failure to provide this data will prevent us from acting. We may also process your personal data without your consent when it is

necessary for our legitimate interests, such as pursuing claims, ensuring IT security, or for video surveillance purposes.

### **3. Legal basis for processing personal data.**

This Policy reflects the Personal Data Controller's approach to ensuring the highest degree of diligence in protecting the right to privacy and acting in accordance with applicable law, in particular the provisions of the General Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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.

The basis for processing individual categories of data in accordance with the GDPR are:

- Article 6, act 1, letter a of the GDPR - your consent,
- Article 6, act 1, letter b of the GDPR – pre-contractual activities, conclusion of the contract and the possibility of its implementation,
- Article 6 act 1 letter c of the GDPR - compliance with the legal obligation imposed on the Data Controller under EU or Polish law,
- Article 6, act 1, letter f of the GDPR - implementation of the legitimate interest of the DPO

### **4. Period of storage of personal data.**

We hereby inform you that the Administrator of your data processes it in accordance with the adopted retention policy, only as long as there is a basis for its processing:

- o for categories of data whose processing results from the law, in accordance with dedicated regulations,
- o in the case of data processing for the purpose of implementing a contract concluded between us, personal data will be processed for the period necessary to implement and settle the contract, unless the regulations provide otherwise, e.g. for tax settlement purposes,
- o in the case of processing your personal data for the purposes of our legitimate interests, we will process them for as long as this interest exists and, in the case of video surveillance, no longer than 90 days,
- o If your consent was the basis for processing your personal data, the processing will continue until you withdraw your consent to the processing of your personal data for the purpose for which you consented. However, despite your withdrawal of consent, we will be able to process your personal data if we are authorized to do so by generally applicable law (e.g., to establish, pursue, or defend legal claims).

## **5. Rights of the data subject.**

In connection with our processing of your personal data, you have numerous rights, in particular:

### **5.1. The right to request access to personal data**

At any time, you may request information about what personal data we process and for what purposes. You may also request information about which entities we have entrusted to process your personal data and how long we will process it.

You may also request a copy of your personal data that we process. The first copy is always free of charge. If you request a second copy, we may charge a nominal fee to cover the administrative costs associated with providing it. If the request for a copy of personal data is made electronically and does not include a request for a copy in another form, you will also receive a copy of the data electronically.

If issuing a copy of your personal data cannot be done without disclosing the personal data of other people, we will inform you that such a copy cannot be issued.

### **5.2. The right to request rectification of personal data.**

If you believe your personal data is incorrect, incomplete, or outdated, you may request its correction or supplementation.

### **5.3. The right to request the deletion of personal data**

You can request that we delete your personal data at any time when:

- a) these data are no longer necessary to achieve the purposes for which they were collected or otherwise processed,
- b) you find that we are processing your personal data unlawfully and this is legally justified,
- c) personal data must be deleted in order to comply with a legal obligation under European Union law or Polish law,
- d) you withdraw your consent to the processing of your personal data, and their processing was carried out on the basis of that consent.

In all these cases, we will delete your personal data without undue delay. However, your request will not be honored if:

- a) when further processing of your personal data is necessary for us to comply with our legal obligations under EU or Polish law,
- b) when further processing of your data will meet our legitimate interests, for establishing or pursuing claims.

### **5.4. The right to request restriction of the processing of personal data.**

Restricting the processing of personal data means marking them in processing systems in such a way that their processing can be limited in the future.

You can request the restriction of the processing of your personal data when:

- a) you question the accuracy of the personal data – for a period enabling the Administrator to check the accuracy of such data;
- b) In your opinion, the processing is unlawful and you oppose the deletion of your personal data, requesting instead the restriction of their use;
- c) The Controller no longer needs your personal data for processing purposes, but you, i.e. the data subject, need them to establish, pursue or defend legal claims;
- d) you have objected to processing under Article 21(1) of the GDPR – pending determination of whether the legitimate grounds on the part of the Controller override the grounds for your objection.

If the right to process data has been restricted, the Controller may only store such data. Any other type of processing may only be carried out with your consent, or to protect the rights of another natural or legal person, or for important reasons of public interest of the Union or a Member State.

We will always inform you before lifting the restriction on the processing of your personal data.

#### **5.5. The right to object to the processing of personal data.**

When we process your personal data for purposes based on our legitimate interests, you may object to its processing. In such a case, we will cease processing it unless we demonstrate grounds for further processing to establish, pursue, or defend legal claims, or if we demonstrate that our interest in processing your data overrides your rights.

#### **5.6. The right to request the transfer of personal data**

If we process your personal data by automated means, based on your consent or in connection with the performance of a contract between us, you may request that we provide you with your data in a structured form, in a commonly used electronic file format (e.g., Excel), so that you can transfer the data to another entity. You may also request that such a file be transferred to a personal data controller other than us, designated by you.

#### **5.7. The right to lodge a complaint with the supervisory authority.**

At any time, if you believe that our processing of your personal data violates your rights or is for other reasons inconsistent with Polish or European Union law, you have the right to lodge a complaint with the President of the Personal Data Protection Office.

#### **5.8. Reporting and handling the rights of natural persons**

1. Requests from individuals regarding the exercise of the rights specified in the GDPR may be directed to the Controller, in particular:

- a) in writing to the following address: Extral Sp. z o.o., ul. Wygoda 2, 44-240 Żory
- b) by e-mail to the following address: [iod@extral.com](mailto:iod@extral.com)



2. A request from a natural person regarding the exercise of rights should include:

- a) data regarding the natural person: name and surname of the person to whom the report relates and the person reporting it,
- b) a description of the request submitted along with an indication of any reservations,
- c) signature of the person submitting the request in the case of written requests,
- d) signature of the person submitting the request in the case of written requests,
- e) information about the preferred form of response, if the response channel is to be different from the submitted request.

3. Before fulfilling the request, the Controller may ask the natural person to verify his or her identity using other data.

4. The Controller has implemented organizational and technical measures to ensure the implementation of the aforementioned rights, so that it can fulfill the data subject's requests without undue delay, no later than one month from receipt of the individual's request. In the case of a complex request or a significant number of requests, the Controller will, within one month of receipt of the individual's request, inform the data subject of the extension of the deadline by a maximum of two additional months, along with the reasons for the delay.

5. If the request of an individual cannot be accepted, the Administrator will inform the individual within the above-mentioned deadlines about the refusal to comply with the request and provide the reasons.

6. The Administrator's actions in response to submitted requests are free of charge. Exceptionally, if a natural person's requests are manifestly excessive, the Administrator has the right to charge a fee that reflects the costs of providing a response.

7. The Controller informs that in some cases, even if the right to delete data is exercised, for record-keeping purposes or to finalize the request, it will retain certain information that was initiated before the specific request was submitted.

## **6. Recipients or categories of recipients of personal data**

The processing of your personal data may be entrusted to other entities. Entrusting such processing to cooperating entities always takes place on the basis of a concluded contract. Entrusting data processing means that third parties will have access to your data, but only for the purpose of processing it on our behalf and for the purposes we specify. These entities will not process your personal data to achieve their own purposes.

Your data may also be shared with other entities when required by law. Sharing personal data means transferring this data to a third party (i.e., other than the data subject, controller, or processor) in a way that allows that party to access the data and use it independently for a specific purpose.

The data controller discloses personal data only in cases provided for by law or on the basis of the express consent of the data subject.

Personal data may be shared with, among others:

- authorized public authorities (e.g. courts, law enforcement agencies);

In order to fulfill your order, the contract concluded between us, or the legitimate interest of the Controller, your personal data may be transferred in particular to the following entities or categories of entities:

1. entities providing hosting services to us,
2. entities providing accounting and bookkeeping services to us,
3. entities providing IT services to us.
4. public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes specified in generally applicable law.

## **7. Profiling.**

As part of our business activities, we do not conduct profiling as referred to in Article 4(4) of the GDPR, meaning that we do not process your personal data in an automated manner by using your personal data to evaluate certain personal factors (e.g., to assess preferences, interests, location, etc.).

## **8. Final provisions.**

The Personal Data Administrator uses security measures to protect your data against loss, misuse, and modification. The Personal Data Administrator undertakes to protect all your data in accordance with security standards, confidentiality, and GDPR guidelines.

The purpose of processing, scope and duration of processing are discussed in detail in dedicated information clauses.