

PERSONAL DATA PROTECTION POLICY

Dear Sirs,

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

The administrator 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 "ADO").

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

- by letter to the company's address given above,
- by e-mail to the following address: iod@extral.com

For better contact with us, we have appointed a Data Protection Officer in the person of Mrs. Bożena Krawczuk, available at: iod@extral.com

We will try to answer your questions as soon as possible. However, we will always provide a reply no later than within 7 days, unless the problem turns out to be more complex, then we will reply within 30 days. We would like to inform you that we use the organizational, technical and legal measures required by the current provisions on the protection of personal data to prevent unauthorized acquisition and modification by unauthorized persons of your personal data processed by the Administrator in any form, especially those 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 directly or indirectly identified, in particular on the basis of an identifier such as name, identification number, location data, internet identifier, image.

2. Purpose of processing personal data

Your personal data will be processed:

- for purposes resulting from statutory activities, and described in detail in separate clauses.

We process personal data under the authorization resulting from applicable regulations (Article 6 (1c) of the GDPR), to the extent necessary to perform our activities, perform the contract. Of course, providing your personal data for the purpose is always voluntary, but the lack of this data will prevent us from acting. We will also be able to process your personal data without your consent, when it is dictated by our legitimate interest, e.g. for the purpose of pursuing claims, ensuring IT security or for the purpose of video monitoring.

3. Legal grounds for the processing of personal data.

This Policy reflects the approach of the Administrator of your data to ensure the highest diligence in the field of protection of the right to privacy and to act in accordance with applicable law, in particular the provisions of:

1/ General Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC,

2/ Dedicated acts for local government units.

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

- Article 6 (1) (a) of the GDPR - your consent,
- Article 6 (1) (b) of the GDPR - conclusion and possible implementation of the contract that connects us,
- Article 6 (1) (c) of the GDPR - fulfilment of the legal obligation imposed on ADO under EU law or Polish law,
- Article 6 (1) (f) of the GDPR - implementation of the legitimate interest of the ADO,
- Article 9 (2) (a) of the GDPR, the data subject has expressly consented to the processing of this personal data,

4. Period of personal data storage.

Please be advised that the Administrator of your data processes them in accordance with the adopted retention policy, only as long as there is a basis for their processing:

- o for the categories of data the processing of which results from the law, in accordance with dedicated regulations,
- o in the case of data processing in order to implement the contract concluded between us, personal data will be processed for the period necessary to perform and settle the contract, unless the provisions provide otherwise, e.g. for the purposes of tax settlements,
- o in the case of processing your personal data for the implementation of our legitimate interests, we will process them until this interest exists, and for monitoring up to 3 months,
- o if the basis for the processing of personal data was your consent, the data processing will be carried out until you submit a declaration of withdrawal of consent to the processing of personal data for the purpose for which the consent was granted. However, despite the withdrawal of consent, we will be able to process your personal data if we are entitled to do so by generally applicable law (e.g. to establish, assert or defend claims).

5. The data subject's rights.

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

5.1. The right to request access to personal data

At any time, you can request information about what personal data are processed by us and for what purpose we process. You can also request information about which entities we have entrusted with processing your personal data and how long we will process them.

You can also request us to provide you with a copy of the personal data we process. The first copy of such data is always free. In the event that you request a new one, we may charge a symbolic fee for its issuance, covering the administrative costs associated with its issuance. If the request for a copy of personal data is made by means of electronic communication and does not contain a request for a copy in a different form, then you will also receive a copy of this data by electronic means.

If it is not possible to issue a copy of your personal data without disclosing the personal data of other people, we will inform you that it is not possible to issue such a copy.

5.2. The right to request the rectification of personal data.

If your personal data is, in your opinion, incorrect, incomplete or out of date, you can contact us with a request to correct or supplement it.

5.3. The right to request the deletion of personal data

You can request us to 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/ when you find that we are processing your personal data unlawfully and it will be legally justified,
- c/ personal data must be removed in order to comply with the legal obligation provided for in European Union 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 this consent.

In all these cases, your personal data will be deleted by us without undue delay. Nevertheless, the request will not be fulfilled in the case of:

- a/ when further processing of your personal data is necessary for us to be able to fulfil our legal obligation under EU or Polish law,
- b/when further processing of your data will fulfil our legitimate purpose, to establish or pursue claims,

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

Limitation of the processing of personal data should be understood as marking them in the processing systems that will allow for limiting their processing in the future.

You may submit a request to limit the processing of personal data when:

- a) you question the correctness of personal data - for a period allowing the Administrator to check the correctness of this data;
- b) in your opinion, the processing is unlawful and you oppose the deletion of the personal data and request the restriction of their use instead;
- c) The administrator no longer needs your personal data for the purposes of processing, but you need them, i.e. the data subject, to establish, assert or defend claims;
- d) you have raised an objection pursuant to Art. 21 paragraph 1 GDPR against processing - until it is determined whether the legitimate grounds on the part of the Administrator override the grounds of your objection.

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

Before revoking the restriction on the processing of your personal data, we will always inform you about it.

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

When your personal data is processed by us for the purposes of our legitimate interests, you will be able to object to their processing. In this case, we will stop processing them, unless we show grounds for their further processing in order to establish, assert or defend claims, or if we demonstrate that our interest in processing your data overrides your right.

5.6. The right to request the transfer of personal data

If we process your personal data in an automated manner, based on your consent, or in connection with the performance of a contract concluded between us, you will be able to request us to receive your data in a structured form, in a commonly used electronic file format (e.g. Excel) so that you can transfer this data to another entity. You will also be able to request the transfer of such a file to a personal data administrator other than us.

5.7. The right to lodge a complaint with a supervisory authority.

At any time, when you believe that the processing of your personal data by us violates your rights or for other reasons is inconsistent with Polish or European Union law, you have the right to lodge a complaint with the President of the Data Protection Office (ul. Stawki 2, 00-193 Warsaw).

5.8. Reporting and handling of the rights of natural persons

1. Requests of natural persons to exercise the rights indicated in the Regulation may be directed to the Administrator:

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

2. The notification of a natural person's request for the implementation of rights should include:

a) data regarding the natural person: name and surname to whom the application relates and the person submitting the application,

b) description of the submitted request with an indication of any reservations,

c) signature of the person submitting the request in the case of written applications,

d) power of attorney if an attorney acts on behalf of the person submitting the request,

e) information on the preferred form of response, if the response channel is to be different from the submitted request.

3. Before processing the request, the Administrator may ask the data subject to verify his identity.

4. The administrator has implemented organizational and technical measures to ensure the implementation of the above-mentioned rights to be able to meet the requests of natural persons without undue delay, no later than within one month of receiving the request of a natural person. In the event of a complex request or a significant number of requests made, the Administrator, within one month of receiving the request of a natural person, will inform the data subject to extend the deadline by a maximum of two months, stating the reasons for the delay.

5. In the event that the request of a natural person cannot be taken into account, the Administrator will inform the natural person in the above-mentioned time limits for the refusal to fulfil the request together with the reasons.

6. The Administrator's actions taken in response to submitted requests are free of charge. Exceptionally - if the requests of a natural person are evidently excessive - the Administrator has the right to charge a fee in the amount taking into account the costs of responding.

7. The administrator informs that in some cases, even in the case of exercising the right to delete data, for recording purposes or finalizing the request, he will keep certain information that was initiated before submitting a specific request.

6. Receivers 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 written agreement. Entrusting data processing means that third parties will gain access to your data, but only for the purpose of processing it on our behalf and within the scope of the purposes specified by us. These entities will not process your personal data to achieve their goals.

To complete your order, the contract concluded between us, or the legitimate interest of the Administrator, your personal data may be entrusted in particular to the following entities or categories of entities:

1. entities providing postal and courier services,
2. entities providing hosting services to us,
3. entities providing accounting and legal services to us,
4. entities providing IT services to us.
5. public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes that result from the provisions of generally applicable law.

Your personal data will not be transferred to a third country or an international organization.

7. Profiling.

As part of our business, we do not perform profiling referred to in art. 4 point 4 of the GDPR, which means 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 ensure data protection against loss, misuse and modification. The personal data administrator undertakes to protect all your data in accordance with security protection standards while maintaining confidentiality and the guidelines of the GDPR.

The purpose of processing, scope and time of processing are detailed in the dedicated clause. Informational.