

DATA PROCESSING NOTICE
ANGEL POLAND HOLDING SP. Z O.O., WITH ITS SEAT IN KRAKÓW - CONSENTS GIVEN VIA THE FORM

Dear All,

in connection with the fact that **Angel Poland Holding Sp. z o.o., with its registered office in Kraków** (hereinafter: the **Company**) may process your personal data as the controller, which may take place if you give the Company the relevant consents via the form provided by the Company. Below please find details of the principles the Company will apply to process your personal data. We encourage you to read the content of this document and if you have any questions, we remain at your disposal.

Who is the Controller of your personal data?

The Controller of the personal data provided to us by you or any other entity is **Angel Poland Holding sp. z o.o.**, with its registered office in Kraków, ul. Sukiennicza 8/U7, 31- 069 Kraków, entered in the register of businesses maintained by the District Court for Kraków-Śródmieście in Kraków, 11th Commercial Division of the National Court Register under KRS number: 0000625927, REGON: 364890865, VAT No.: 6762509774 (hereinafter: **the Controller**).

Who can I contact if I have questions about the processing of my personal data?

To provide answers to questions related to personal data processing the Controller employed a Data Protection Inspector, who can be contacted at: iod.krakow@angelpoland.com.pl.

What personal data do we collect?

We process your personal data in the course of our business. However, we always endeavour to obtain only the personal data we need, aiming to collect as little data as is actually required.

As you have given your consents, the Company may process ordinary personal data, i.e.:

- a) identification data, i.e.: first name and surname;
- b) contact data, i.e.: home address, telephone number, e-mail address – depending on your consent;

How did we obtain your personal data?

Your personal data is or will generally be provided by you personally, e.g. when you fill in and submit a form via our website or complete it at the Company's premises. However, your personal data may also be provided to the Company by someone else e.g. a family member or a relative. Therefore, the Company may also receive your personal data from a third party.

In the event that your personal data is provided to the Company by another entity or person as referred to above, the Company may process your personal data provided to it, which may include:

- a) identification data, i.e.: first name and surname;
- b) contact data, i.e.: address, telephone number, e-mail address – depending on your consent.

What are the purposes and legal basis for the processing of your personal data?

Your personal data are processed by the Company in accordance with the provisions of 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 (hereinafter: „GDPR”), and the Data Protection Act of 10 May 2018, as well as other generally applicable data protection legislation.

Where you have given your consents (consent) to the Company, the purposes and grounds for processing your personal data may be as follows:

- a) Article 6(1)(a) of GDPR, i.e. the consent you have given for the purposes set out in the consent (if given). Consent may be withdrawn at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal;
- b) Article 6(1)(f) GDPR, i.e. in the legitimate interest of the Controller,

i.e. for the purpose of: securing and asserting possible claims by the Company, but also, to a limited extent, for the purpose of undertaking direct marketing activities by the Company;

- c) Article 6(1)(c) of the GDPR, i.e. the fulfilment of legal obligations imposed on the Company related to, for example, the need to document consents granted to the Company;
- d) Article 6(1)(f) of the GDPR, i.e. in the legitimate interest of the Controller, i.e. for the purpose of: communicating with you by answering your questions in relation to the commercial information sent to you, or in relation to informing you about new products and promotions of the Company or about new products and promotions of other companies with capital and personal links to the Company, and handling of the contact form.

How long will your personal data be processed?

Your personal data will be processed by the Company for the period prescribed by law or, in the absence of relevant statutory guidelines, for a period determined in each case according to the nature of the personal data provided. In determining the period of processing of personal data, the Company takes into account issues such as obligations towards tax authorities, the need to make relevant financial settlements, but also the periods of limitation of claims of the parties. After the expiry of the established processing periods – the personal data will be deleted or anonymised.

The Company will process the data provided to it for the period required to achieve the purpose of the processing, such period to be determined in particular personal by the provisions of law. Please note however, that based on the legitimate interest of the Controller, the data will be processed for a period during which claims related to this contract may arise, i.e. for 6 years + 12 months from the end of the year, in which the contract was terminated (expired). The period referred to above covers the limitation period for introducing claims, as well as tax aspects. This period has been extended by additional 12 months to account for last minute claims or problems with serving, and it starts running from the end of the year in order to determine a single date for the erasure of data for contracts ending in a given year. On the basis of consent the data will be processed until it is withdrawn. Upon expiry of these periods the data will be deleted or anonymised.

In case of any doubts as to the retention periods adopted by the Company for your personal data, please contact us using the Company's details shown above or at the following email address: iod.krakow@angelpoland.com.pl.

Is the provision of personal data mandatory?

As a general rule, the Company is not entitled to require you to provide personal data, and thus the provision of personal data is voluntary.

Please note that failure to provide your personal data will make it impossible:

- a) to provide you with commercial information and inform you about new Company products and promotions or new products and promotions from other companies with capital and personal links to the Company;
- b) for the Controller to share your personal data by with Angel Poland Group Sp. z o.o. for the purpose of marketing and promotion of the services and products of this entity, thus making it impossible for this company to contact you via the telephone number and/or e-mail address provided by you to promote the services and products of this entity.

- depending on the consent given by you.

Notwithstanding the above, failure to provide your personal data will prevent the Company from processing the form (application) provided to you.

Please note that if you have not provided the Company with personal data yourself, such data – as we have already indicated above – may have been provided to the Company by, for example, a member of your family, or another entity or person.

Who is your personal data shared with?

The Company shall not share, sell, or trade your personal information with third parties for marketing purposes. We may disclose your personal data only if we are expressly obliged or legally authorised to do so (e.g. disclosure of data requested by the police), or if you have consented to such disclosure.

At the same time, we would like to point out that we may entrust the processing of your data to entities cooperating with us, but that this will only happen with carefully selected entities that guarantee the processing of your data in a lawful manner and with respect for your privacy, including on the basis of a data processing agreement. Entities to whom your personal data may be transferred by the Company may be those providing IT services, hosting services, marketing services, or accounting services to the Company.

What are your rights do you have in relation to the processing of your personal data?

In connection with the processing of your personal data, you have the following rights:

- 1) **Right of access** – you have the right to request information about what personal data we process about you at any time.
- 2) **Right to request rectification** – you can always request that your personal data be corrected if they are incorrect, or that incomplete data be completed.
- 3) **Right to request erasure** – you can always request that the personal data we process be erased. Unfortunately, this will not always be feasible, as sometimes the obligation to process will be connected to, for example, provisions of law. If that is the case we will inform you of this.
- 4) **Right to request restriction of processing** – you can request that we restrict the processing of your personal data.
- 5) **Right to object** – you may also object to the processing of your personal data based on our legitimate interests, which applies in particular to direct marketing carried out by us.
- 6) **Right to withdraw consent** – where we process your personal data on the basis of consent, you have the right to withdraw such consent at any time. The withdrawal of such consent will not affect the lawfulness of the processing carried out before its withdrawal.

To exercise your rights, please contact us using the Company's details shown above or at: iod.krakow@angelpoland.com.pl.

Right of complaint

If you find the explanations or actions of the Company insufficient or defective – you have the right to lodge a complaint with the President of the Personal Data Protection Office.

Will your data be processed by automated means or be profiled?

Your personal data will not be processed by automated means and will not be profiled.

Will my personal data be processed outside the EEA?

As a general rule, the processing of your personal data takes place in the territory of the European Economic Area (EEA). However, in certain situations there processing outside this area may occur. This applies in particular to the activities of further processors. In such cases, however, your personal data will be transferred to these countries on the basis of, *inter alia*:

- a decision of the European Commission finding an adequate level

of data protection (in relation to countries for which such a decision has been issued);

- standard data protection clauses adopted by the European Commission (for other countries).

Is something not clear?

If the above information is not sufficient or clear to you, or if you have questions, please contact us at iod.krakow@angelpoland.com.pl or at the Company's contact details indicated above.



ANGEL POLAND
GROUP