



THE  
**UPPER HOUSE**

BY ANGEL

## **PRIVACY POLICY**

Angel Park 1 Sp. z.o.o. Sp. k., having its registered office in Wrocław

Dear Residents,

If you use our upperhouse.pl website or wish to use the services we offer, we may process your personal data. This Privacy Policy explains the principles and scope of processing of your personal data by us, your rights, and our obligations as a data controller.

### **1. Who controls your personal data?**

Your personal data controller is Angel Park 1 Sp. z.o.o. Sp. k., having its registered office in Wrocław, ul. Walońska 11/4U, 50-413 Wrocław, entered in the register of businesses of the National Court Register under KRS number: 0000623266 (hereinafter also as: the **Company**).

If you have any questions (including how to exercise your rights), you can contact us by post (at the above address), or by email at: [upperhouse@angelpoland.com.pl](mailto:upperhouse@angelpoland.com.pl)

### **2. What personal data do we collect?**

Personal data, as defined by law, is any information relating to an identified or identifiable natural person. The catalogue of personal data is open, but we can include, among other things, your name, address, e-mail address, identification numbers, biometric data, physical, physiological, economic, cultural, or social characteristics.

We process your personal data in the course of our business. However, we always endeavour to obtain only the personal data that we need, striving to collect as little data as we actually require. For this reason, we make a distinction between the data we collect if you are an employee of ours, a customer, a representative of a customer who is a legal entity, or if you only use our website.

You do not need to provide us with any personal data in order **to visit our website**. The situation is different, however, **if you are interested in our business offer** and wish to enter into business relations with us (use our services). In order for us to provide you with an offer, we will need to obtain from you the following personal data: name, e-mail address, and telephone number.

If you **become our counterparty**, we will require further personal data. This is due to a change in the nature of the cooperation. The personal data that we usually obtain in such a situation are primarily: first name, surname, PESEL, address of residence or correspondence address, telephone number and e-mail address provided to us for contact purposes, bank account number and other information related to the subject of the agreement (e.g. description of the property, nature of the cooperation, duration of the agreement, etc.).

### **3. What is the legal basis and purposes of our processing of your personal data?**

Your personal data are processed by us 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 (GDPR), and when we obtain your personal data **we always inform you of the basis for processing**. Additionally, we inform you whether you are obliged to provide us with certain personal data, and what the possible consequences of not providing us with such personal data are.

Most commonly, we process your personal data **on the following basis** (at least one basis indicated below is necessary for us to process your personal data):

- 1) consent to the processing of personal data** – consent is given if you wish to receive a commercial offer from us (except where we act on the basis of our legitimate interest in direct marketing), or if you apply for employment with our companies (recruitment process), although in the latter case the basis for the processing of some of your personal data may be the provisions of the Labour Code (if you apply for employment based on an employment contract);
- 2) provisions of law** – in many situations we are legally obliged to process your personal data. This applies to our obligations as an employer, but also to the settlement of civil law contracts concluded with our counterparties;
- 3) conclusion and performance of contracts** – when you enter into a contract with us we are obliged to process your personal data to the extent that enables us to conclude the contract and to perform it properly;
- 4) legitimate interests of the data controller** – finally, we would like to point out that we may also process your data on the basis of our legitimate interests.

This is the case both when we carry out direct marketing (to which you may object at any time), as well as, for example, when we assert claims in connection with concluded contracts, or in the scope of the monitoring we use.

### **4. Do we transfer personal data outside the European Economic Area (EEA)?**

Your personal data are not transferred outside the European Economic Area. However we cannot rule out the possibility that in the future your personal data will be transferred outside the EEA – but in such a situation you will be informed about it in advance, and the Company will take all actions provided for by law in order to ensure that such a transfer complies with the applicable legal regulations and provides for the maximum possible protection of your personal data.

### **5. Do we process personal data by automated means, or carry out profiling?**

We do not process your personal data by automated means, or carry out profiling. Please be informed, however, that the Company cannot exclude that in the future it will process your personal data in an automated manner or carry out profiling. Please note that if a decision is made to process your personal data by automated means, such as profiling, you will be informed in advance, and the Company will take all steps required by law to ensure that such processing is carried out in accordance with applicable law and with the maximum possible protection of your personal data.

### **6. Is the provision of personal data mandatory?**

We are not entitled to require you to provide us with personal data, so the provision of personal data is always voluntary, but it may be necessary in order to provide you with our services. Thus, failure to provide us with personal information,

may prevent us from taking certain actions. For example, if you do not provide us with the contact details required to contact you, we will not be able to respond to your enquiry. And if you refuse to provide us with your personal data when signing a contract, then it will not be possible to conclude the contract.

## **7. How long do we store your personal data for?**

The period for which we store (process) your personal data is linked to the purposes and basis of the processing. The retention period for personal data entrusted to us for contact purposes is different than when we process personal data in connection with a contract concluded with us and the obligations incumbent upon us in this situation. When determining the period for processing of personal data we take into account such issues as our obligations towards tax authorities, or those related to the necessity of making financial settlements, or limitation periods for claims of the parties related to the concluded contract.

When we process your personal data on the basis of your consent (which is the case in our marketing activities) – we process the data no longer than until you withdraw your consent to the processing of your data. The same effect is triggered by an objection to the processing of your personal data on the basis of our legitimate interest (direct marketing).

Notwithstanding the above, we assure you that after these periods your data will be deleted or anonymised.

## **8. What rights do you have in relation to our 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, as well as to have incomplete data 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.

## **9. What can be done if we process your data improperly?**

If you believe that we process your personal data in a manner inconsistent with the law, we would appreciate hearing from you. Please note that in such a situation you have the right to lodge a complaint with the **President of the Personal Data Protection Office**.

## **10. Who has access to your data?**

It is our policy not to 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 to or legally authorised to do so (e.g. when the police request your data), or if you have consented to this disclosure (e.g. for a marketing offer to be presented by a third party - the relevant check boxes on the website are used to indicate this consent).

At the same time, we reserve the right to entrust the processing of your data to entities cooperating with us, which will however always take place only 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 processing of personal data agreement.

### **11. Links to third party websites**

Insofar as our website refers to the websites of third parties, including via a link, we accept no responsibility for the correctness or completeness of the content presented therein, or for data security. In view of the fact that we have no influence on the observance of data protection principles by third parties, we recommend that you always check the data protection notices presented there. We also encourage you to read the privacy policy on these pages.

### **12. Updating our Privacy Policy and final provisions**

We cannot exclude the possibility that we may need to update our Privacy Policy in the future. The latest version will always be available on our website [www](http://www). Additionally we will inform you of any changes to the content of the document, such as changes to the purpose for which we use your personal data, or how you can contact us.