

Notice on the processing of personal data by Orzeł Biały Spółka Akcyjna

1. Who is the administrator of your personal data?

Orzeł Biały Spółka Akcyjna with its registered office at Piekary Śląskie at ul. Harcerska 23 (41-946) (hereinafter referred to as the **Administrator** or **Orzeł Biały**) is the administrator of personal data (hereinafter the **Data**) processed by us in connection with its business activities.

Orzeł Biały is a member of the Orzeł Biały Group of Companies. The current list of all member companies of Orzeł Biały Group is published by Orzeł Biały in periodic reports, available at: www.orzel-bialy.com.pl/pl/ir/okresowe.

The Data are processed in accordance with the current regulations in this General Regulation on the Protection of Personal Data (GDPR)¹.

The Data shall mean all and any information about an identified or identifiable natural person. An identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name, identification number, location data, internet identifier or one or more specific factors determining physical, physiological, genetic, psychological, economic, cultural or social identity of a natural person.

2. How do we process the Data?

Orzeł Biały takes special care to protect the interests of the persons to whom the Data applies, and in particular ensures that the collected Data are:

- processed in accordance with the law, fairly and transparently for the data subject;
- collected for specific, explicit and legitimate purposes and not further processed in a manner inconsistent with such purposes;
- adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- correct and updated as necessary;
- stored in a form that permits the identification of the data subject for no longer than is necessary for the purposes for which the Data are processed;
- processed in a manner that ensures appropriate data security including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by way of appropriate technical or organizational measures.

3. When do we process the Data?

We process data in many situations. These may be situations where you have provided your Data in person through various communication channels (e.g. sending an inquiry/offer via e-mail or telephone) or as part of our cooperation when signing or executing a contract, but also when we obtained your Data from other sources (e.g. from a company that you work with and which is our contractor/customer).

4. Data Processing in relation to business relations and contact.

a. What Data are processed in relation to business relationships and contact?

As an Administrator, we process the Data of our business partners (investors, subcontractors, contractors), their employees/co-workers, Data of other people provided to us as part of the contracts as well as other people who contact us via telephone or email.

In conjunction with business relations and contact, we can process the following Data: Identification data, Communications Contact Data, Workplace and professional skills/competences Data and other Data provided to us in connection with a business cooperation or contact.

¹ The General Data Protection Regulation or Regulation of the European Parliament and of the Council 2016/679 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.

We collect the above Data directly from data subjects as well as from other people, e.g. from their employers/clients.

b. What is the purpose and basis of the Data processing in relation to business relations and contact?

In relation to business relationships and contact, we process the Data for the following purposes:

- establishing cooperation;
- conclusion and performance of a contract;
- settlement of contracts;
- responding to any questions or requests submitted and conducting further correspondence/contact in this regard;
- marketing and contact regarding other information and services of Orzeł Biały;
- defense against potential claims, as well as for the purpose of any claim management.

The basis for Data processing by Orzeł Biały is:

- indispensability to perform the contract or take action before its conclusion at the request of the data subject;
- implementation of legal obligations imposed on the Administrator;
- the legitimate interest of the Administrator in the form of marketing of the Administrator's or third party's products and services, contact, including correspondence and defense against potential claims.

Providing the Data is voluntary. However, their provision may be necessary to conclude or perform the contract or to reply to an inquiry submitted or to proceed with the correspondence.

c. How long will the data be processed in relation to business relations and contact?

The Data collected for the purposes of the conclusion and performance of the contract will be processed for the duration of the contract, and then until the expiration of any possible claims.

The Data of people who have contacted Orzeł Biały will be processed for the period necessary to answer and possibly conduct correspondence, and then until the expiry of the period of limitation of possible claims.

d. Who is the recipient of Data in relation to business relations and contact?

The Data processed by us in connection with business relations and contact may be transferred to other companies from Orzeł Biały Group, to our business partners and other contractors supporting us in the organization of work, IT services and marketing.

5. Do your Data go outside the European Economic Area (EEA)?

Your Data does not go beyond the European Economic Area, and if in the future a transfer to a place outside the EEA is to be made, Orzeł Biały takes appropriate steps to protect Data, in particular by:

- use of specific contractual clauses called "standard contractual clauses" that have been approved by the European Commission; or
- transfer to countries for which the European Commission has issued a decision stating the appropriate level of protection.

In this case, you have the right to obtain a copy of the appropriate protective measures.

6. What rights do you have?

Under the terms of the applicable regulations, you have the right to:

- access to Data, including the right to obtain a copy thereof;

- demand Data rectification, erasure or limitation of processing;
- object to Data processing;
- transferring Data to another administrator (to the extent that the basis for their processing is indispensability to perform the contract or your consent).

If the processing of Data takes place on the basis of consent, you have the right to revoke it at any time without affecting the legality of the processing which was made on the basis of consent before its withdrawal.

You are also at all times entitled to file a complaint to the President of the Office for the Protection of Personal Data.

7. Contact:

You may contact Orzeł Biały Spółka Akcyjna at the following e-mail address: office@orz-el-bialy.com.pl or by phone +48 (32) 779 65 00.