

Privacy Policy

This Policy has been adopted further to the effective date of 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 (OJ L 119/1, 4.5.2016; hereinafter: GDPR). The purpose of the Policy, in particular, is to comply with an information provision obligation, which is referred to in Article 13 and Article 14 of GDPR.

1. Definitions

The following terms are used in the Policy:

- 1) We, Befaszczot, Data Controller – Befaszczot spółka z ograniczoną odpowiedzialnością [limited liability company], with its registered office in Bielsko-Biała (43-300), Poland, at ul. Paderewskiego 7, entered in the Register of Entrepreneurs of the National Court Register (KRS) maintained by the District Court in Bielsko-Biała, 7th Commercial Division of KRS under the number 0000407099, having NIP (Tax Identification Number) 9372661808, REGON (Statistical Identification Number) 000139436,
- 2) You – data subjects, whose personal data is processed by Befaszczot.

2. Who is the Data Controller?

The Data Controller is a person who establishes purposes and means of personal data processing. Befaszczot is the Data Controller of your personal data.

3. What personal data do we process?

Further the conducted business activity, we process, in particular, the personal data of: our business partners, who are natural persons (including: customers, suppliers, etc.), contact persons indicated by the above-mentioned business partners (including: sales representatives, persons indicated as responsible for the execution of joint projects, managers, etc.), users of our online services, persons with whom we exchange communication, persons being granted a possibility of entering the premises of our plant, persons interested in being employed, and also persons who have relations with our employees that bring about legal consequences (including: children, family members, etc.). The scope of processed data from time to time corresponds to the purposes of processing.

4. What are the purposes of data processing by us?

Your personal data may be processed for the following purposes:

- 1) performance of the concluded contracts or in order to take steps at your request to enter into a contract (pursuant to Article 6(1)(b) of GDPR). In such event, the data is processed during a term of the contract, and also such further period that is required for the full execution of rights and

obligations arising from it,

- 2) the performance of legal obligations to which we are subject, especially with regard to tax law, regulations on accounting or archiving, laws on anti-money laundering, regulations governing the system of social insurance, etc. (Article 6(1)(c) of GDPR). The duration of data processing is then determined by regulations that form the basis for a specific obligation,
- 3) execution of our legitimate interest (Article 6(1)(f) of GDPR) – consisting in:
 - a) conducting direct marketing of our goods or services,
 - b) preparing summaries, analyses, and statistics – which, in particular, includes marketing research, commercial data analysis, planning of service development, etc.,
 - c) executing rights related to any failure to perform or improper performance of contracts by business partners,
 - d) exchanging communication by means of any known technologies, including: traditional mail, electronic mail (e-mail), or other methods of communication (e.g. online communicators, etc.),
 - e) establishing contacts by telephone,
 - f) initiating and maintaining business contacts,
 - g) proper displaying of our websites,
 - h) performing visual monitoring of our plant (plants) – to the extent necessary to ensure safety of persons and property that is located in its(their) premises, and keeping confidential information the disclosure of which could expose us to damage.

In the cases referred to in point 3 - data shall be processed during the term when the interest for which it is processed is maintained. In particular: (i) marketing activities shall be conducted until you have submitted a relevant objection, while (ii) a record from visual monitoring shall be stored for not more than 3 months, unless the generally applicable regulations provide otherwise.

- 4) Sometime, your personal data may be processed for other purposes, pursuant to relevant consent – expressed in a voluntary, specific, informed, and clear way (Article 6(1)(a) of GDPR). In particular, the consent shall be the basis for the processing of data collected for the purposes of recruitment needs (data included in CVs, etc.).

In such event: (i) data shall be processed during a period corresponding to the purpose indicated in the content of consent, (ii) you have the right to withdraw such consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

5. Is provision of personal data obligatory?

No, you do not have an obligation to provide us with your personal data. Nonetheless, your refusal may result in impossibility of execution or performance the agreement concluded with us or performance of other actions by us (e.g. sending communication, obtaining access to the plant's premises, participating in a recruitment process, etc.).

6. Can the data be processed in processes that include automated decision-making, including “qualified” profiling?

Currently, we do not use any operations under which automated decision-making would be purposed resulting on the part of its addressee legal consequences or significantly affecting them in a similar form. If such operations relating to the processing of personal data are implemented in the future, we shall ensure their compliance with relevant regulations, including Article 22 of GDPR.

7. To whom we may make your personal data available?

Your personal data may be made available to third-party entities only in the event whereby we shall be obliged to do so or authorised under regulations of law. Recipients of data may especially include:

- 1) processors, including:
 - a) le,
 - b) sub-contractors participating in the execution of obligations assumed for you,
 - c) persons providing services related to execution or improvement of the selling process (e.g. payment intermediaries, couriers, or carriers, advertising agencies, experts involved in complaint procedures),
 - d) persons performing audit or advisory services for us – e.g. in terms of legal, tax, or accounting assistance.
- 2) other data controllers, including:
 - a) public administration authorities authorised to request provision of data,
 - b) companies associated with us,
 - c) other entities – in cases whereby the nature of performance executed by them for us makes the indicated entities individually define the purposes and ways of processing of personal data and therefore, they become controllers of personal data. In particular, it may apply to: advertising agencies, agencies participating in the organisation of contests or promotional events, banks, couriers and carriers, and also entities collaborating with us while providing support for accounting, tax, or legal issues,
 - d) buyers of your debts – in the event whereby we have decided to sell such receivables, especially in view of the existence of substantial payment arrears.

We do not disclose your personal data to persons, who are not authorised to its processing.

8. Can your personal data be transmitted outside the European Economic Area (EEA)?

Currently, we do not envisage transmitting your data outside the European Economic Area. We cannot rule, however, that we shall consider it to be reasonable in the future. In such event, your data shall be secured in the manner required by generally applicable regulations, especially by applying the so-called standard contractual clauses (SCC).

9. What rights do you have further to the processing of your data?

You may in particular make a request to us for:

- 1) access to the data processed by us (including: the information on the processing of such data by us or for the provision of the copy of data),
- 2) data rectification (correction),
- 3) restriction of processing (suspension of operations on data or non-erasure of it),
- 4) data erasure (“right to be forgotten”),
- 5) data transfer to another data controller.

The above requests may be sent especially in the manner defined in point 13 below and they shall be reviewed in accordance with relevant regulations, including Articles 15-20 of GDPR.

10. Right to object

Irrespective of the above, you have the right to object to the processing of data that is performed on the basis of our legitimate interest. In such event:

- 1) if the personal data is processed for marketing purposes – we shall immediately stop such processing,
- 2) if the processing of data is based on another kind of interest – we shall stop such processing, unless we demonstrate that: a) the said interest overrides your interests, rights, and freedoms, or b) there are grounds for determining, pursuing, or defending claims.

The right to object may be especially exercised by sending a relevant statement in the manner defined in point 13 below.

11. Lodging a complaint with a supervisory authority

In the event whereby you consider that the processing of data applicable to you breaches the applicable regulations, you shall have the right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office.

12. Publication venue and updates of the Privacy Policy

The Privacy Policy may be from time to time amended. The current version of the Policy shall be from time to time made available on our website at the following address: www.befaszczot.com.pl.

13. How can you reach us?

Should you have any questions concerning the manner in which we use your personal data, we may be contacted by telephone, electronic mail, or mail at the following numbers and addresses:



BIELSKO-BIAŁA, UL. PADEREWSKIEGO 7

Befaszczot Sp. z o.o. 43-300 Bielsko-Biała, Poland, ul. Paderewskiego 7 - with an annotation:
"ochrona danych osobowych" [personal data protection], tel. +48 33 819 00 40; e-mail:
rodo@befaszczot.com.pl.