

Privacy Policy

INFORMATION NOTICE about the processing of your personal data by PEKABEX DEVELOPMENT SP. Z O.O.

Pekabex Development sp. z o.o. respects the privacy of those whose data it processes and takes the utmost care to ensure that the data are processed in accordance with the law and international principles of good practice. Pekabex Development sp. z o.o. makes special efforts to protect privacy and information provided to the Company. The entrepreneur with due diligence selects and applies appropriate technical measures, including those of a programming and organisational nature, which ensure the protection of the processed data, in particular protects the data against unauthorised access, disclosure, loss and destruction, unauthorised modification, as well as against their processing in violation of the applicable law.

The Entrepreneur shall apply strict internal and external safeguards to ensure the protection of the privacy of data subjects. The controller of personal data shall exercise permanent control over the processing of the data and shall restrict access to the data as far as possible by granting appropriate authorisations only when this is necessary for the proper processing of personal data.

I. Personal data controller

Pursuant to Article 13(1 and 2) and Article 26(2) of Regulation (EU) 2016/679* of the European Parliament and of the Council of 27/04/2016 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 (General Data Protection Regulation) Official Journal of the European Union L 119, p. 1) – **hereinafter GDPR** – we inform that: we process your personal data.

Please read this notice.

1. As the Controller, we are responsible for fulfilling the information obligation
2. Whenever this notice refers to the **Personal Data Controller**, it means **Pekabex Development sp. z o.o.**
 - i. Contact address – ul. Szarych Szeregów 27, 60–462 Poznań
 - ii. Email: administrator.pdsz@pekabex.pl
 - iii. Contact details of the Data Protection Officer: iod.pdsz@pekabex.pl
3. As the Controller, we would like to inform you that in matters of personal data protection you can contact us using the above mentioned data.

II. Data Protection Inspector

We have appointed a Data Protection Officer who you can contact with in matters concerning the protection of your personal data and the exercise of your rights, at this e-mail address: iod.pdsz@pekabex.pl or in writing to the address of our registered office, indicated in section I.

III. Objectives and basis of processing

We will process your personal data for one or more of the following purposes:

1. in order to conclude a contract/cooperation on the basis of your interest in our offer (basis: Article 6(1)(b) of GDPR);
2. for the performance and on the basis of the contract/letter/document you have concluded with us (basis: Article 6(1)(b) of GDPR);
3. to analyse the selection of services to meet the needs of our customers; optimize our products based on your comments about them, your interest, application technical logs; optimize service processes based on

- sales and after-sales service processes, including complaints, which is our legitimate interest (basis: Article 6(1)(f) of GDPR);
4. for archival (evidential) purposes to safeguard information in case of a legal need to prove facts, which is our legitimate interest (basis: Article 6(1)(f) of GDPR);
 5. in order to possibly establish, investigate or defend against claims, which is our legitimate interest (basis: Article 6(1)(f) of GDPR);
 6. to examine customer satisfaction and determine the quality of our service, which is our legitimate interest (basis: Article 6(1)(f) of GDPR);
 7. for the settlement of contracts (basis: Article 6(1)(b) of GDPR);
 8. to reply to any enquiry or request made and to continue correspondence or contact in this regard (basis: Article 6(1)(b) of GDPR);
 9. in order to defend ourselves against potential claims, as well as for the possible referral of claims, which is our legitimate interest (basis: Article 6(1)(f) of GDPR);
 10. in order to fulfil the obligation imposed on the controller (basis: Article 6(1)(c) of GDPR);
 11. in order to fulfil the obligation imposed on the controller who is part of a group of companies listed on the Stock Exchange (basis: Article 6(1)(c) of GDPR);
 12. in connection with recruitment activities, we will process your data for the following purposes:
 - a) to consider a candidacy and for execution of the recruitment process, and in case of consent, also for the needs of future recruitment or recruitment within Pekabex Capital Group,
 - b) to defend against potential claims, as well as to raise any claims.The legal basis for the processing is the current legislation in force, including in particular the Labour Code and any secondary legislation, and to a greater extent than specified in these provisions and for future recruitment, based on your consent.

IV. Data we process

By personal data we will understand any information about an identified or identifiable natural person (data subject). We will process the data in question in various situations where you have provided us with your data through various channels of communication, such as, for example, submission of an application as part of a recruitment process, a request for quotation by e-mail/telephone/writing, or as part of your declarations or contracts. In addition, there may be situations in which we will process your data from other sources, such as from entities with which you cooperate, which are our contractors or entities with which we have a relationship (e.g. in the course of judicial or administrative proceedings, etc.).

We will process the following categories of your data:

1. In connection with the recruitment process, we process the data that will be given to us during the recruitment process and collected during the recruitment process. Given the above, depending on the situation, the following data may be processed, among others: basic identification data, identification data granted by public authorities, electronic identification data, skills data, existing employment, qualifications, education, data on means of communication, other data provided to us during the recruitment and contract conclusion process.

2. In connection with the business processes, execution of particular duties, including those arising from the concluded contracts/letters/documents or statements made, we will process the data provided to us in connection with the conclusion of these documents, whether acquired in the course of the process of their conclusion or the execution of related duties or entitlements, i.e. data of the business partners: clients, contractors, employees, co-workers, contact details, identification data, data concerning jobs, professional entitlements, as well as other data acquired in connection with the given relationship.

The processing of certain data may be subject to your consent.

V. Data recipients

We may share your personal data with the following categories of entities:

Companies that are part of Pekabex capital group, subcontractors, i.e. entities which we use for their processing, such as accounting, IT, consulting, law firms or other entities providing a range of services as part of our business processes. The scope of entities is variable. Therefore, you can always ask us who we are currently working with and to whom we are providing your data.

VI. Transfer of data to third countries or international organisations

We do not transfer your data outside the European Economic Area.

VII. Data retention period

1. We keep your data obtained during the recruitment process for the duration of the recruitment process until the statute of limitations for any claims related thereto.
2. We process your contract data until the end of the statute of limitations for potential claims against the Contract.
3. We store your basic contact details for the marketing of our products and services until you object to their processing for this purpose, revoke your consent if we have processed them on the basis of the so-called marketing consent, or we determine that they are obsolete.
4. Your personal data will be processed for the purpose of fulfilling the obligation imposed on the controller, and your data will be processed for the time necessary to fulfil this obligation.

VIII. Requirement to provide data

Providing personal data is voluntary; however, failure to provide data marked as necessary for the service/contract/activity will make the above process impossible.

IX. Your rights:

You are entitled to:

- a) the right to access and receive copies of your data
- b) the right to rectify (correct) your data
- c) the right to delete your data.

If in your opinion there are no grounds for us to process your data, you can request that we delete it. If the data subject exercises his or her right to be forgotten (right to delete data), the controller removes from all their systems, without undue delay, data originating from that person. The indicated obligation to delete data in the event of such a request applies only to data

obtained on the basis of the consent given. If the basis of data processing is a contract whose performance requires data processing, then the right to be forgotten shall not apply. In such a situation, a request for deletion of data will require premature termination of the contract.

d) restrictions on data processing

You may request that we restrict the processing of your personal data to the storage or performance of activities agreed with you if you believe that we have incorrect data about you or are processing it unjustifiably; or you do not want us to delete it because you need it to establish, assert or defend your claims; or for the duration of your objection to the processing. In automated data storage, the processing is in principle limited by technical means in such a way that personal data cannot be further processed or altered. Examples of methods of limiting the processing are: temporarily transferring selected personal data to another processing system or preventing system users from accessing selected data.

e) the right to object to data processing: objection to process data for marketing purposes. You have the right to object to the processing of your data for the purpose of direct marketing. If you exercise this right, we will stop processing the data for this purpose.

Objection on grounds of special situation. You also have the right to object to the processing of your data on the basis of a legitimate interest for purposes other than direct marketing and where the processing is necessary for us to carry out a task carried out in the public interest or to exercise public authority entrusted to us. You should then indicate to us your particular situation that you think justifies our discontinuation of the processing you object to. We will stop processing your data for these purposes unless we can demonstrate that the grounds for our processing of your data take precedence over your rights or that your data is necessary for us to establish, assert or defend a claim.

f) the right to transfer your data

The right to data transfer enables the request that it is the data controller who holds the data to send it to another controller, but only in so far as this is technically possible.

g) the right to lodge a complaint with a supervisory authority

h) the right to withdraw consent to the processing of personal data

You have the right at any time to withdraw your consent to the processing of those personal data that we process on the basis of your consent. Withdrawal of consent will not affect the lawfulness of any processing that has been carried out on the basis of your consent before it is withdrawn.

In order to exercise your rights, please send a letter to us at the addresses given in section I. Remember, before exercising your powers, we'll have to make sure that you are you, i.e. identify you properly.

If a data subject considers that his or her data are being unlawfully processed, they shall have be entitled to:

- a) an effective remedy in court against a legally binding decision of a supervisory authority concerning a data subject,
- b) an effective remedy in court, against the controller.

The initiation of legal proceedings against the Controller of personal data is possible independently of complaints made to the supervisory authority.

X. Principles of personal data processing

The personal data controller strives to ensure and makes every effort to ensure that personal data processed by the Company is:

Processed lawfully

1. The processing of data shall be based on one or more of the following legal bases:
 - a) the data subject has consented to the processing of his/her personal data for one or more specified purposes;
 - b) processing is necessary for the performance of a contract to which the data subject is a party or to take action at the request of the data subject before entering into a contract;
 - c) processing is necessary to fulfil the legal obligation imposed on the personal data controller;
 - d) processing is necessary to protect the vital interests of the data subject or of another individual;
 - e) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data take precedence over these interests.
2. The data subject's consent to data processing must be given in a voluntary, specific, informed and unambiguous manner. In addition, the consent must be an explicit action – statement or confirmation. Consent forms should be formulated in clear and legible language, i.e. in a way that is understandable to the person whose data are to be processed. Consent is associated with the active action of the person – therefore there is no possibility to presume its existence.
3. Clauses of consent to the processing of personal data may be placed on the form or website together with other information. In this case, where the data subject gives his or her consent in a written statement which also covers other matters, the request for consent must be set out in such a way as to distinguish it clearly from other matters, in an intelligible and easily accessible form, in clear and plain language.
4. Where personal data are processed for several purposes, the data subject's consent must be obtained for all these purposes.
5. The controller shall ensure that personal data are not further processed in a way incompatible with the previously specified purposes. In the event of a decision on further processing of personal data, the Company will endeavour to obtain the relevant consent of the subjects of such data.

Processed correctly and reliably

1. The personal data controller strives to ensure that the collected personal data is correct and up to date and that its processing is carried out without interruption.
2. The controller of personal data shall implement technical and organisational measures to correct the data, reduce the risk of errors and delete incorrect data. This means the implementation of appropriate processes and functionalities at the level of applications, as well as databases.

3. The data subject shall be entitled to have his or her data corrected and completed.

Processed in accordance with the purpose limitation principle

1. The purpose limitation principle means that personal data may only be collected for a specific, explicit and legitimate purpose which cannot be achieved by other means.
2. The purpose of the processing must be determined at the time of acquisition.
3. If the processing is based on consent, it shall relate only to the specific purpose of the processing. A new purpose of data processing requires new consent.
4. The controller shall inform the data subjects about the purposes of the processing.

Processed in accordance with the principle of data minimisation

1. The scope of the data collected must be adequate and limited to the minimum necessary to achieve the stated purpose.
2. Minimization consists in selecting only the data that are necessary for the Company's operations and limiting the data storage period.
3. Before starting the process of data acquisition and subsequent processing, the Company precisely defines the purposes and corresponding types of data, and sets a deadline for deletion and periodic review of data.
4. The Entrepreneur shall keep personal data for no longer than is necessary for the purposes for which the data were collected.

Processed in accordance with the principles of integrity and confidentiality

1. The personal data controller processes the data in a way that guarantees an appropriate level of security.
2. The integrity principle refers to ensuring that data are not modified, deleted, added or destroyed in an unauthorised way.
3. In accordance with the principle of confidentiality, the personal data controller prevents personal data from being made available or disclosed to unauthorized entities or processes.
4. The Entrepreneur has adapted and implemented appropriate technical measures to ensure the integrity and confidentiality of the data.
5. The Entrepreneur implements security, monitoring and response measures, including, among others, elements of user access control, application and infrastructure security rules, measures dedicated to protection against data leakage.

Processed in accordance with the principle of accountability

1. The Controller aims to have a documented and periodically verified knowledge of personal data, including:
 - a) an inventory of the data processed;
 - b) their location;

- c) provide means of access control for users (applications, databases) to define the required access rights, monitor and periodically verify them;
 - d) defining and monitoring data processing procedures;
 - e) having the technical means to monitor the functioning of the network infrastructure and applications;
 - f) processes that support detection and response to security incidents.
2. The personal data controller is obliged to notify the supervisory authority of any identified personal data breaches.

Processed in accordance with the principle of information transparency

1. The personal data controller shall ensure that any information addressed to individuals is formulated in simple and transparent language.
2. The principle of information transparency means prohibiting the inclusion of relevant information in "small print", incorporating it into long and complicated text, or placing it among other, irrelevant information.

XI. Final Considerations

1. The personal data controller is aware of their responsibility to comply with the relevant legislation and to follow good practice in the field of personal data protection.
2. The personal data controller develops, maintains and maintains the Register of Personal Data Processing Activities at the Entrepreneur's premises. The Register is a tool for accounting for data protection compliance in the Company.