

## GDPR INFORMATION CLAUSE

### To whom is the information addressed?

The clause describes the principles for processing the data of:

- Our customers and contracting parties;
- Leads;
- Recipients of our marketing content;
- Persons acting on behalf of our customers;

and is provided in accordance with the obligation under Articles 13 and 14 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 (OJEU.L.2016.119.1, as amended) - hereinafter referred to as the GDPR.

### Controller's data and contact details

The Controller, i.e. the one responsible for ensuring the confidentiality of your data, is:

**ETOS Czesław Szymendera Spółka z ograniczoną odpowiedzialnością [limited liability company]** with its registered

office in Golina, ul. Jarocińska 42, 63-200 Golina

email: [rodo@etos.net.pl](mailto:rodo@etos.net.pl)

Categories of Persons - Voluntary Provision of Data	Purpose of Processing	Data Storage Period	Legal Basis
Customers and contracting parties - With regard to the data needed for the conclusion and performance of the contract, the provision of data is voluntary but necessary. Failure to do so will make it impossible to carry out the said action. As regards the data necessary for issuing an invoice, the contracting party or customer is obliged to provide it in accordance with tax regulations. Failure to do so will make it impossible to issue the invoice.	<ul style="list-style-type: none"> <li>• Contract conclusion and performance, including order processing;</li> <li>• Invoice issuance, accounting settlements, tax payment;</li> <li>• Defence and exercise of possible claims;</li> <li>• Facilitating contact by providing additional data, such as instant messaging data (email address).</li> </ul>	5 years after the year of termination of the contract, and in the event of the exercise of claims - until they are satisfied or the statute of limitations has expired. Where no business relationship is established, the data shall be erased immediately, unless its retention is justified for the defence of claims, in which case the data shall be retained until the statute of limitations for such claims.	<ul style="list-style-type: none"> <li>• Contract concluded (Article 6(1)(b) of the GDPR);</li> <li>• Tax regulations, in particular the Act on the Tax on Goods and Services, as well as the Accounting Act (Article 6(1)(c) of the GDPR);</li> <li>• The Controller's legitimate interest in being able to defend and exercise claims (Article 6(1)(f) of the GDPR);</li> <li>• Voluntary consent (Article 6(1)(a) of the GDPR).</li> </ul>



Leads - Provision of data is voluntary, but necessary to establish a business relationship or provide an offer	<ul style="list-style-type: none"> <li>• Presenting goods and services offered;</li> <li>• Establishing a business relationship;</li> <li>• Direct marketing;</li> <li>• Providing answers to enquiries.</li> </ul>	Until a business relationship is established and a contract concluded (from then on, the data is processed as customer data). Where no business relationship is established, the data shall be erased immediately, unless its retention is justified for the defence of claims, in which case the data shall be retained until the statute of limitations for such claims.	<ul style="list-style-type: none"> <li>• The Controller's legitimate interest in being able to establish a business relationship, to present its offer at the request of a lead and to answer enquiries (Article 6(1)(f) of the GDPR);</li> <li>• Consent to be provided commercial and marketing information by electronic means - given on the basis of marketing consent (Article 6(1)(a) of the GDPR).</li> </ul>
Recipients of our marketing content - Provision of data is voluntary, but necessary to receive information.	<ul style="list-style-type: none"> <li>• Direct marketing.</li> </ul>	Until marketing information is no longer provided or the recipient objects to such an action or withdraws his/her consent.	<ul style="list-style-type: none"> <li>• Consent to be provided commercial and marketing information by electronic means (Article 6(1)(a) of the GDPR).</li> </ul>
Persons acting on behalf of our customers and contracting parties - With regard to the data needed for the conclusion of the contract, the provision of data is voluntary but necessary. Failure to do so will make it impossible to carry out the said action. With regard to other data, its provision is voluntary and does not affect the business relationship with the customer or contracting party.	Making it possible to conclude and perform a contract with the entity on whose behalf the person acts.	Data indicated in contracts up to 5 years after the year of contract termination. Data related to correspondence for a period of 5 years after receipt of the message. In the event that claims arise in relation to acting on behalf of our customer or contracting party, until they are satisfied or the statute of limitations has expired.	<ul style="list-style-type: none"> <li>• The Controller's legitimate interest in the proper fulfilment of its business obligations and in contacting customer and contracting party representatives on related matters (Article 6(1)(f) of the GDPR);</li> <li>• Provisions of the Civil Code (Article 6(1)(c) of the GDPR)</li> </ul>

## Rights under the GDPR

Every person has the right to:

- Withdraw the consent on the basis of which the data is processed;
- Request the Controller to access, rectify, erase or restrict the processing of their personal data, or the right to object to the processing, as well as the right to data portability.

In order to exercise these rights, please contact the Controller in writing, by email or by telephone.



## Right to lodge a complaint

Any person whose data is processed by the Controller has the right to lodge a complaint against unlawful processing with the President of the Personal Data Protection Office (UODO) (Information on the rules for lodging complaints: <<https://uodo.gov.pl/pl/83/155>>).

## Data recipients

Data may be shared with entities that ensure the correct operation of services such as our website or our email software.

The data of our customers and contracting parties may be shared with a cooperating law firm, accounting office, debt collection company, accounting firm, postal operator or courier company.

## Source of data and scope of data provided

The Controller obtains data directly from the data subjects.

However, data of persons acting on behalf of our customers and contracting parties may be provided to the Controller in the content of contracts concluded or orders placed. The scope of such data is the full name, position, place of work and business contact details.

The Controller may also obtain data from publicly available sources, such as the National Court Register (KRS), the Central Registration and Information on Business (CEIDG) or a white list of taxpayers in order to attempt to establish a business relationship or verify the registration data of a customer/contracting party. The scope of data so obtained is consistent with the scope of publicly available information in these registers.

## Information on automated decision-making

Your data shall not be subject to profiling or automated decision-making.

## Information on transfer of data outside the European Economic Area

Your data shall not be transferred to any third country/international organisation.

