

**PRIVACY NOTICE OF DATA CONTROLLER
REGARDING PROCESSING OF CUSTOMERS' PERSONAL DATA
CC Polska Biuro Handlowe - Krzysztof Stanek
Bukowno 2019**

Introduction

In the light of the principles of, and rules on the protection of natural persons with regard to the processing of their personal data, CC Polska Biuro Handlowe - Krzysztof Stanek (further: CC Polska) is acting as a Data Controller of your personal data. This means that all your personal data collected in connection with the entering into the contract or during its execution should be processed by us in a manner that ensures appropriate security of your personal data, in accordance with the provisions of the contract and in compliance with the applicable laws.

In order to ensure a consistent and high standard of processing your personal data, we would like to provide you with the most important information regarding the processing of personal data collected as a result of the cooperation with CC Polska.

We confirm that we have taken every possible step to make sure that this privacy notice adheres to EU and local laws requirements in regards to protection of personal data, in particular to fully complies with the REGULATION (EU) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (further "General Data Protection Regulation" or "GDPR").

What is included in the privacy notice?

This privacy notice sets out how we protect and use your personal data.
Please read this document carefully.

1. Who is a data controller for your personal data?

CC Polska Biuro Handlowe - Krzysztof Stanek, with registered office at ul. Urzędowa 16, 32-332 Bukowno, NIP: 6441358202, REGON: 120914320 is acting as a **Data Controller**.

2. What personal data is being collected on you by CC Polska?

- 2.1. CC Polska may collect various categories of Customers' personal data, depending on the purposes of processing.
- 2.2. By concluding a contract with you, we require you to provide us with your personal details, such as name and surname (in the case of individuals) or the company details and place of residence or your company's registered office location as well as the tax

identification number. We may also collect personal data of the company's representatives, who may take part in the negotiations phase and/or participate in the conclusion and execution of the contract (name, e-mail address or telephone number). Provision of such personal data is a contractual requirement necessary to perform contractual obligations, without which we cannot provide services to you (the contract will not be concluded). Sometimes we can also ask for additional data such as: mailing address (for deliveries), e-mail address and contact number. Those kind of personal data facilitate cooperation and the implementation of the contract.

3. How your personal data is collected/gathered by CC Polska?

- 3.1. CC Polska collects certain information provided directly from you either during negotiations and entering into the contract as well as during the execution of it.
- 3.2. CC Polska may also collect certain information indirectly, in particular:
- in the scope of personal data used in court proceedings, in dispute resolution and required by statutory and regulatory bodies;
 - from banks or other financial institutions (in connection with payments specified in contract) regarding account details which is a source of the payment.

4. For what purpose does CC Polska use your personal information and what is the legal basis for do so?

- 4.1. In accordance with article 6 GDPR, CC Polska only collects personal data when it has a clear legal basis to process that data. The conditions which justify the collection of your personal data are as follows:
- the processing is necessary for the performance of a contract or in order to take steps at the request of the prospective customer (data subject) prior to entering into a contract (lawful basis: Contractual undertaking; Article 6 paragraph 1 point (b) of the GDPR);
 - CC Polska has a clear and foreseeable legitimate interests in the processing of your personal data connected with its business activities, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject (individuals) which require protection of personal data (lawful basis: legitimate interests of CC Polska acting as the Data Controller; Article 6 paragraph 1 point (f) of the GDPR);
 - the processing is necessary for compliance with a legal obligation to which CC Polska acting as the Data Controller is subject (lawful basis: Legal requirements; Article 6 paragraph 1 point (c) of the GDPR);
 - the processing is necessary in order to protect your vital interests (Article 6 paragraph 1 point (d) of the GDPR);
 - you have given us a specific and freely given consent to the processing of your personal data (lawful basis: Consent; Article 6 paragraph 1 point (a) of the GDPR).

4.2. Your personal data collected during the conclusion of the contract and during its term, CC Polska uses for the following purposes:

- the conclusion and execution of the contract - for the duration of the contract and after its completion (lawful basis: Contractual undertaking; Article 6 paragraph 1 point (b) of the GDPR);
- where necessary, processing designed to enable CC Polska to perform its legal obligations, such as issuing and storing invoices and accounting documents in so far as it is required by applicable laws - for the period in which we should perform legal obligations and for the retention period in which laws require us to store certain data, e.g. tax documentation (lawful basis: Legal requirements; Article 6 paragraph 1 point (c) of the GDPR) or for the period during which we may face the legal consequences of non-performance of this obligation (lawful basis: legitimate interests of CC Polska; Article 6 paragraph 1 point (f) of the GDPR);
- detection and prevention of a fraud - for the duration of the contract (lawful basis: Contractual undertaking; Article 6 paragraph 1 point (b) of the GDPR) and after that for a claims' period of prescription in regards to claims arising from the contract, and in the case of CC Polska claims or notifications by the public and governmental authorities – for a period necessary for potential legal proceedings or other investigation activities (lawful basis: legitimate interests of CC Polska; Article 6 paragraph 1 point (f) of the GDPR);
- establishment, exercise or defense of legal claims - for claims' period of prescription in regards to claims arising from the contract (lawful basis: legitimate interests of CC Polska; Article 6 paragraph 1 point (f) of the GDPR);
- conducting analyzes, audit, customer research, satisfaction surveys, and other statistics for internal needs or for needs of CC Polska customers-for the duration of the contract (lawful basis: Contractual undertaking; Article 6 paragraph 1 point (b) of the GDPR) and after that for a claims' period of prescription in regards to claims arising from the contract (lawful basis: legitimate interests of CC Polska; Article 6 paragraph 1 point (f) of the GDPR);
- direct marketing - (lawful basis: legitimate interests of CC Polska; Article 6 paragraph 1 point (f) of the GDPR).

5. How long will your personal data be stored for?

5.1. CC Polska will retain your personal data for a period required by applicable laws or for a period in which processing personal data is necessary to fulfill the purposes outlined in this Privacy Notice.

5.2. After the expiration of the above period, personal data and any copies of them will be anonymised or deleted from any electronic devices and/or the hard copies of such personal information will be destroyed as well.

6. Will your personal data be shared with any third parties?

6.1. CC Polska shall not disclose your personal data to third parties unless:

- **personal data is processed by an external entity based on a written Data Processing Agreement:**

CC Polska shares the personal data with companies which cooperate with us and with other trusted companies or individuals who process personal data on behalf of CC Polska in accordance with our instructions and the Information Security Policy and take appropriate technical and organizational measures to protect the confidentiality and information security; the entities processing data on our behalf and participating in the performance of our activities are, among others:

- a) Service providers that provide and maintain our ICT systems and companies that provide us with tools to collect and store personal data;*
- b) Our subcontractors that support us in the performance of our services and products;*
- c) Intermediaries that assist in the sale of our services;*
- d) Companies that provide us with services in areas of consulting, audit, legal, tax, financial and payroll accounting and business advisory and other entities who act as our contractors.*

- **the legal requirements exist:**

We will be obliged to provide personal data if the applicable laws or court order require to do so, in particular in connection with legal process, litigation, and/or requests from public and governmental authorities - to the extent defined by these bodies.

- 6.2. In order to execute the contract (delivery of goods), CC Polska provides customer address data to logistic partners: the Raben Group - the rules of data processing by the logistics partner can be found on the website: <https://polska.raben-group.com/nasza-odpowiedzialnosc/bezpieczenstwo-informacji/>
- 6.3. CC Polska will ensure that the transfer of personal data to a third country located outside the European Economic Area is conducted in compliance with General Data Protection Regulation and the appropriate and/or suitable safeguards. You have right at any time to obtain a copy of your personal data processed by such companies and to obtain the list of companies to which your personal data has been made available by sending a request to the e-mail address: biuro@ccpolska.eu.
- 6.4. Such entities and business partners have implemented at least the same privacy standards as used by CC Polska with respect to the use of this data and they are bound by appropriate confidentiality agreements.

7. How will your personal data be secured?

- 7.1. We have taken every possible step to protect your personal data against unauthorized access, unauthorized modification, disclosure and destruction of personal data held by CC Polska. For this purpose we:
 - make internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data;

- grant access to your personal data only to those contractors with a clear “need to know” for business and who are subject to confidentiality obligations.

8. Will your personal data be subject to automated decision-making, including profiling?

8.1. Your personal data is **NOT** subject to automated decision-making, including profiling.

9. How will you control your personal data? What rights do you have?

9.1. In general CC Polska, acting as a Data Controller, has to enable you to execute your rights in accordance with the applicable data privacy regulations, including:

- **the right to access the data collected** by us, i.e. the access to certain information about: the purpose(s) of processing, the recipients of your personal data, the scope (the categories of personal data concerned) and the right to receive the copy of personal data concerning you (data portability);
It is important for us that you will have easy access to personal data processed by CC Polska. In case you require information about personal data processed by us, then please send your subject access request by an e-mail address: biuro@ccpolska.eu. In response, we will inform you about the scope of personal data processed by CC Polska concerning your person.
- **the right to rectification**, i.e. right to correct the personal data we processed, to supplement incomplete data or to update it;
If the personal data processed by CC Polska are incorrect, incomplete or out of date please contact us at: biuro@ccpolska.eu. We will do our best to quickly make the necessary modifications, update them or remove inaccuracies.
- **the right to erasure („right to be forgotten”)**, i.e. the right to request immediate deletion of your personal data if unlawfully processed;
Please note that we will not be able to delete all data about you. Some data - due to legitimate interests or legal requirements of CC Polska - we will have to retain. Each time we will notify you whether your personal data included in the request has been removed, and if not - in addition we will inform you about the reasons why we cannot meet your demand.
- **the right to restriction of processing**, i.e. temporarily remove your personal data from our databases or suspend any processing activities on your personal data, e.g. if the accuracy of the personal data is contested (for a period enabling CC Polska to verify the accuracy of such data) or when you have objected to the processing (pending verifications whether the objection is valid);
- **the right to receive the personal data concerning you (right to data portability) and right to transmit those data to another data controller.**

10. Right to object - what is this?

- 10.1. Regardless of the rights specified in point above of this Privacy Notice, you also have the right to object at any time to the processing of your personal data used for direct marketing purposes. After accepting your objection in this case sent to the e-mail address: biuro@ccpolska.eu, we will not use your personal data for direct marketing purposes.
- 10.2. In specific situations, you may object to the processing of your personal data at any time if the lawful basis for the processing of your data is the legitimate interests of CC Polska or the public interest. In this case, after considering your objection, we will no longer be able to process your personal data on this basis, unless we prove that there are:
- compelling legitimate grounds for the processing of your personal data which override the interests, rights and freedoms of the customer or
 - grounds for the establishment, exercise or defense of legal claims

11. CONSENT- as a legal basis for processing your personal data

If the processing of your personal data is not connected with the performance of a contract, the compliance with a legal obligation or does not constitute our legitimate interests, CC Polska may request you to give the consent to use certain personal data. You can withdraw your consent at any time by sending us an appropriate request. **However, the withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal.**

12. COMPLAINT

You may also exercise the right to file a complaint regarding the use of your personal data. To do this, please send an e-mail with detailed information about the complaint to the address biuro@ccpolska.eu. We will investigate your complaint promptly and provide you with answers. Individuals also have the right to lodge a complaint to the President of the Office for Personal Data Protection. More information about the rights of individuals and how to file a complaint with the Office for the Protection of Personal Data can be obtained at www.uodo.gov.pl

13. How to contact CC Polska?

In case you require more information about how CC Polska processes and uses the personal data, then please go to the following website: www.ccpolska.eu or contact us at: biuro@ccpolska.eu or please use the contact form located on the above website