

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR CLIENTS AND CONTRACTORS AND PERSONS ACTING ON THEIR BEHALF (SO-CALLED 'CONTACT PERSONS')

In order to implement the principle of lawful, fair and transparent processing of personal data in connection with the conduct of our business activities, in accordance with the provisions of the General Data Protection Regulation ('GDPR'), it is our intention to introduce our personal data processing notice for Clients and Contractors. Among other things, here you will find an explanation how and for how long we process your personal data and what your rights are in relation to this.

Acting on behalf of ActisPRO sp. z o.o., based in Tychy, we would like to inform you that:

- I. **Administrator and contact:** The administrator of your personal data is ActisPRO Sp. z o.o. with its registered office at ul. Fabryczna 43, 43-100 Tychy, hereinafter referred to as the **'Company'**;
- II. **DPO:** we have appointed a data protection officer. If you have any questions regarding the processing of your personal data and your rights, please contact us: in writing at: **ul. Fabryczna 43, 43- 100 Tychy**, by email to: support@actispro.pl;
- III. **Purposes and legal basis for processing:**
 - **Data of persons representing a contracting party** – your data will be processed for the purpose of concluding and performing the contract concluded between us and the entity you represent (Art. 6(1)(b) GDPR). **Data provision is voluntary**, whereby failure to provide data results in the impossibility of concluding and fulfilling the contract;
 - **Personal data we have obtained during the contract** – your data has been collected in order to ensure the due processing of the contract we have entered into with our contractor (Article 6(1)(f) GDPR, where our legitimate interest is to act in order to fulfil our obligations under the contract entered into). **We have received your data** from your employer/ entity you work with. For this purpose, we process the following **categories of data**: name, role, business telephone number and e-mail address.
 - In addition, your personal data may be processed in order to comply with legal and tax obligations (Article 6(1)(c) GDPR), to establish, investigate, and defend against claims, and for archiving and accountability purposes (Article 6(1)(f) GDPR, where our legitimate interest is to investigate or protect against claims and to ensure that we can demonstrate the legality of our activities).
 - We inform you that **we do not make automated decisions in the contract processing and your data is not profiled**.
- IV. **Data storage period:** Your personal data resulting from the conclusion of a contract will be processed for the duration of the contract and thereafter for the period during which contractual claims may arise and/or the period resulting from the relevant accounting regulations (as a general rule, no longer than 6 years, and for contracts whose subject matter is, inter alia, the transfer of copyright or industrial property rights, for the duration of such rights as determined in accordance with the relevant provisions of applicable law). At the same time, for the purpose of accountability, we will keep the data for the period during which the Company is obliged to retain the data or the documents containing it for the purpose of documenting compliance with legal requirements, including enabling public authorities to audit compliance.
- V. **Recipients of the data:** Your personal data may be disclosed to:
 - a. institutions defined by law, e.g. the Tax Office, Social Security, or others;
 - b. our co-workers, i.e. the individuals with whose help we carry out our services,
 - c. our subcontractors, e.g. suppliers of software, IT systems and server space and applications used by the Company, as well as providers of support services – accounting firms, tax advisors, law firms.We do not currently share data outside the European Economic Area or with international organisations.
- VI. **Rights in relation to data processing:** On the basis of the GDPR provisions, you have numerous rights in relation to your personal data we process. The following is a general description of these rights:
 - a) **Access to personal data.** You can exercise your right to access your data at any time.
 - b) **Correction and completion of data.** You have the right to request that we immediately rectify personal data that is inaccurate and to request the completion of incomplete personal data.

- c) **Right to erasure.** You have the right to demand from us to delete your personal data immediately in any of the following cases:
- when your personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - for data processed on the basis of consent, when you withdraw the consent on which the processing is based and there is no other legal basis for the processing;
 - where you raise an objection to the processing referred to in (e) below and there are no overriding legitimate grounds for the processing;
 - when your personal data is processed unlawfully;
 - when your personal data must be deleted in order to comply with a legal obligation under European Union or Polish law. However, we will not be able to delete your personal data to the extent that the processing is necessary (i) to exercise your right to freedom of expression and information, (ii) to comply with a legal obligation requiring processing under European Union or Polish law, (iii) to establish, assert or defend claims.
- d) **Right to restrict data processing.** You have the right to demand that we restrict processing where:
- you dispute the accuracy of your personal data – for a period of time allowing us to check the accuracy of the data;
 - the processing is unlawful and you object to the deletion of your personal data, requesting instead that we restrict its use;
 - we no longer need your personal data for the purposes of the processing, but you need it to establish, assert or defend your claims;
 - you have objected to the processing referred to in (e) below – until it is determined whether the legitimate grounds on our side override the grounds for the objection.
- e) **Right to object.** On grounds relating to your particular situation, you have the right at any time to object to the processing of your data for our or a third party's legitimate interest (i.e. where our processing of your personal data is based on Article 6(1)(f) GDPR). We will stop processing your data for these purposes unless we can demonstrate that there are compelling legitimate grounds that override your interests, rights and freedoms or that your data will be necessary for the possible establishment, investigation or defence of our claims.
- f) **Right to withdraw consent.** To the extent that the processing of your personal data is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.
- g) **Right to data portability.** To the extent that your data is processed for the purpose of entering into and completing a contract or processed on the basis of consent and the processing is carried out by automated means – you have the right to receive from us in a structured, commonly used machine-readable format your personal data that you have provided to us. You also have the right to send such personal data to another administrator.
- h) **Right to complain.** You have the right to lodge a complaint about the processing of your personal data by us to the President of the Office for Personal Data Protection, address: ul. Stawki 2, 00-193 Warszawa (www.uodo.gov.pl).

The rights referred to in (a) to (g) above can be exercised by contacting us in the manner set out in section 2 above, i.e. by contacting us by e-mail or in writing to our registered office address. In order to exercise the right to complain referred to in point h) above, you should contact the supervisory authority directly.

It will only be possible to exercise the above rights if you provide us with adequate information to properly identify you.