

# PRIVACY POLICY

## I. Data privacy

We pay special attention to the protection of privacy of individuals whose personal data we process. We process your personal data in a safe and lawful manner, in particular, in accordance with the Regulation 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 (“**GDPR**”). In this Privacy Policy we explain how we use the personal data we collect or that is made available to us.

## II. Data controller

The data controller is **SECO/WARWICK S.A., with its headquarters in Świebodzin**, ul. Sobieskiego 8, 66-200 Świebodzin, Poland (“**SWSA**”). You may contact us by sending a letter to our address or by sending an e-mail to [RODO@secowarwick.com](mailto:RODO@secowarwick.com). Should you be dealing with another company of the SECO/WARWICK Capital Group, (especially if filing a request for a quote or request for a proposal), this particular entity may be the data controller of your personal data, of which you will be informed at the moment of personal data collection. You may find the contact details of the companies of SECO/WARWICK Group at: <https://www.secowarwick.com/en/contact/>

## III. Purposes and legal basis of processing

	Purpose of processing	Description of the purpose	Legal basis of processing	Period of storage	Is the provision of data voluntary?
1	<b>E-mail and post correspondence, phone contact</b>	Where correspondence is sent by email or post or where phone contact is made in matters unrelated to any contractual relationship the personal data is processed for the purpose of communication and resolving the matter to which the correspondence or reported matter relates.	SWSA's legitimate interest (Article 6(1)(f) GDPR) in handling correspondence related to its business activities or to resolve a reported matter.	Personal data is processed for a period that enables the reply to the query raised or resolving the matter reported. The records of correspondence is kept for 5 years.	Providing personal data is voluntary but may be required to resolve the reported matter or provide a reply.
2	<b>Recruitment</b>	As part of the recruitment process, SWSA processes personal data of job candidates for the purposes of current and future recruitment (if consent is granted). In exceptional cases data is processed for the purpose of establishing, exercising or defending legal claims.	Processing is necessary to comply with legal obligations of SWSA (Article 6(1)(c))	Personal data will be processed for the duration of the recruitment process and after its completion:	SWSA's right to demand personal data results from provisions of law or is necessary to conclude a contract.

		<p>As regards processing of personal data for recruitment purposes by <b>SECO/WARWICK S.A. Branch in Dąbrowa</b>, please see the information at the end of this Privacy Policy (section X).</p>	<p>GDPR) and to take steps at the data subject's request before entering a contract (Article 6 (1)(b) GDPR). Within the remaining scope (also in case of future recruitment) the basis of processing is consent (Article 6 (1) (a) GDPR or Article 9 (2)(a) GDPR, depending on a type of personal data processed).</p> <p>In exceptional cases - SWSA's legitimate interest (Article 6(1)(f) or Article 9 (2) (f) GDPR) in establishing, exercising or defending legal claims.</p>	<p>- for a period of one year from the end of the recruitment process if you participated in a job interview or you are among the so-called recommended candidates;</p> <p>- will be immediately deleted in other cases unless you consent to the processing of your personal data for future recruitment.</p> <p>Insofar as the processing of your personal data is based on consent, your personal data will be processed until you withdraw your consent, but no longer than the expiry of the above periods.</p> <p>If you give your consent to use your personal data for the purposes of future recruitment, your</p>	<p>Provision of personal data by you is necessary to participate in the recruitment process, and lack of such data will prevent your participation in it. In other respects, providing data is voluntary, but it may affect the assessment of your suitability to work in the position to which the recruitment process applies.</p>
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				personal data will be processed for those purposes no longer than for 12 months from the date on which SWSA received your application. If the processing period of your personal data expires during the recruitment process in which you participate, the storage period of your personal data shall be extended but no longer than until the end of the recruitment process, unless you are employed by SWSA.	
<b>3</b>	<b>Request for quotes, requests for proposals, scheduling appointments, other requests related to the potential contractual relationship</b>	Personal data is processed for the purpose of replying to requests for a quote, requests for proposal, scheduling an appointment or replying to other requests related to the potential contractual relationships.	In relation to negotiations with natural persons - processing is necessary to take steps at the data subject's request before entering a contract (Article 6 (1)(b) GDPR).	In case an agreement is concluded personal data will be kept for periods indicated in point 4 or 5 below.  In case no agreement is concluded personal data will be kept for 5 calendar years	Providing data is voluntary, however, it is required for the request to be handled.

			<p>In relation to negotiations with persons representing legal entities – personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) enabling it to conduct negotiations.</p> <p>In case no agreement is concluded personal data will be stored based on legitimate interest of SWSA (Article 6(1)(f) GDPR) enabling it to keep records of entities it recently negotiated with.</p>	<p>starting from the date of first contact or until you object to the processing and the objection will not be rejected by us in accordance with provisions of law.</p>	
4	<p><b>Provision of services and performance of other contracts (e.g. with clients or suppliers) – natural persons</b></p>	<p>Personal data is processed for the purpose of concluding or performing a specific contract by SWSA (if contracts are concluded with natural persons), including inquiries, purchasing, quality assurance, customer service.</p> <p>In case of clients, we process your personal data also for the purpose of conducting surveys regarding your satisfaction with our services.</p>	<p>Processing is necessary for the conclusion and performance of a contract (Article 6 (1)(b) GDPR).</p>	<p>The data will be retained during the contract term, and thereafter – depending on data category – for the period required by</p>	<p>The provision of data is voluntary, but necessary to carry out activities before entering into a contract, for the conclusion and subsequent</p>

			<p>Processing is necessary to comply with legal obligations of SWSA (Article 6(1)(c) GDPR).</p> <p>SWSA's legitimate interest (Article 6(1)(f) and Article 9 (2) (f) GDPR) in establishing, exercising or defending legal claims.</p> <p>In case of clients - personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) consisting in the right to verify opinion of clients.</p>	<p>relevant provisions of law and the period necessary to handle possible claims (i.e. until the end of the claims limitation period). If you object to the processing of data in relation to surveys and the objection will not be rejected by us in accordance with provisions of law, we will delete data in this respect.</p>	<p>performance of such contract, and for the performance of all obligations resulting from cooperation. As regards surveys - providing data is voluntary, and there are no consequences if it is not provided.</p>
5	<b>Processing of personal data of contact persons and persons representing parties to the agreement (e.g.</b>	In connection with the conclusion and performance of contracts in the course of its business activities (including for purposes related to inquiries, purchasing, quality assurance, customer service), SWSA processes personal data of contact persons and persons representing other parties to those contracts.	Personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) - contract	The data will be retained during the contract term and thereafter – depending on the data category – for a period	Providing data is voluntary, however, it is necessary for contract performance. As regards surveys - providing data is

	<p><b>clients or suppliers)</b></p>	<p>In case of clients, we process your personal data for the purpose of conducting surveys regarding your satisfaction with our services.</p>	<p>performance and to verify the representation of the other party to the contract.</p> <p>Processing is necessary to comply with legal obligations of SWSA (Article 6(1)(c) GDPR).</p> <p>SWSA's legitimate interest (Article 6(1)(f) and Article 9 (2)(f) GDPR) in establishing, exercising or defending legal claims.</p> <p>In case of clients - personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) consisting in the right to verify opinion of clients.</p>	<p>required by the relevant provisions of law and for the period necessary to handle possible claims (i.e. until the end of the claims limitation period). If you object to the processing of data in relation to surveys and the objection will not be rejected by us in accordance with provisions of law, we will delete data in this respect.</p>	<p>voluntary, and there are no consequences if it is not provided.</p>
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6	<b>Webinars, seminars, events</b>	We process your personal data if you register for webinars, seminars or events.	Processing is necessary for the conclusion and performance of a contract or to take steps at the data subject's request before entering into a contract (Article 6 (1)(b) GDPR).	The personal data will be stored for 1 month starting from the moment of participation in the webinar, seminar or event or for the period you are subscribed for the premium content (in case of subscribers).	Providing data is voluntary, however, it is required for registration.
7	<b>Marketing and commercial content subscription (newsletter, premium content e.g. e-books, case studies, white papers)</b>	We process your personal data if you subscribe to our newsletter, premium content or other mailing containing commercial or marketing information for the purpose of sending you such content.	Processing is based on your consent (Article 6(1)(a)(GDPR)	Personal data will be stored not longer than until your consent is withdrawn	Providing data is voluntary, however, it is required for subscription.
8	<b>Lead Generation portals users</b>	We process your personal data for the purpose of sending you an e-mail after you visited our stand on the Lead Generation portal and, if you subsequently consent to receive commercial communication by e-mail from us, your personal data will also be processed for the purpose of sending such communication. Your personal data is also processed by us for archival (including, for the purposes of establishing, exercise and defense of claims), statistical and analytical purposes.	The processing of personal data is necessary for the purpose of SWSA's legitimate interest in conducting marketing activities and analyzing the effectiveness of promotional activities conducted by SWSA, as well	Personal data concerning your visit on our stand on Lead Generation portal is stored 12 months from the moment of your visit. Other periods may apply if you subscribe to our marketing or commercial content or in cases related to claims.	Please see section VI 2) below. As for marketing/commercial content please see point 7 above.

			as for archival purposes (in case of the need to establish, exercise or defend claims), so the basis for processing is Article 6(1)(f) GDPR.		
9	<b>Social media activity</b>	<p>We process your personal data if you interact with our social media profiles.</p> <p>In case of Facebook profile - SWSA and Meta Platforms Ireland Ltd. (4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland) are joint-controllers in accordance with Article 26 GDPR for the processing of personal data in events for Page Insights (statistics purposes). Detailed information is available at <a href="https://www.facebook.com/legal/terms/page_controller_addendum">https://www.facebook.com/legal/terms/page_controller_addendum</a></p>	<p>Personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) – promotion of our products, services and brand; communication with our potential clients; and people interested in our activities; statistical and analytical purposes; establishing, exercising or defending legal claims.</p>	<p>Generally, personal data will be stored until you decide to delete your profile from a social media platform or a given information published by you on the platform will be deleted by you, by us or by the company which operates the given social media portal.</p> <p>In rare cases, we may store certain information published on our social media platforms for the purpose of establishing, exercising or</p>	<p>Providing data is voluntary.</p>



				defending legal claims.	
10	<b>Enabling the use of website</b>	We process personal data for the purpose of enabling the use of our website.	Processing is necessary for the conclusion and performance of a contract (Article 6 (1)(b) GDPR).	During the interaction of the user with our website.	Providing data is not mandatory, however, it occurs automatically if the user interacts with our website.
11	<b>Improvement of website user experience</b>	We process certain information about your preferences concerning the use of our website and about your settings and consent for use of cookies connected with the use of our website by you in order to facilitate the operations of our website and to improve and personalize your user experience when using our website.	Personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) comprising our right to ensure proper and satisfactory use of our website by the users interacting with our website.	No longer than 1 year as of the interaction of the user with our website.	Providing data is not mandatory, however, it occurs automatically if the user interacts with our website. Providing data can be limited depending on the cookie settings used by the user and the consents for the use of cookies granted by the user – see more in our cookie policy.
12	<b>Statistical analysis concerning the use of our website and social media</b>  <b>Online remarketing</b>	We process personal data of users of our websites, social media and marketing activities (e.g. IPs, location, information on the interaction of the users with our website, website tracking information) in connection with cookie files used on our websites, for the purpose of analysis of the manner of use of our websites and to improve the functionality of our website and overall user experience.  For the purpose of analysis of the use of our website, we use Google Analytics tools. For more information on the processing of personal data with the use of Google Analytics tool please visit <a href="http://www.google.com/intl/pl/policies/privacy/partners/">www.google.com/intl/pl/policies/privacy/partners/</a>	Personal data is processed for the legitimate interest of SWSA (Article 6(1)(f) GDPR) – statistical, marketing and analytical purposes.	The period of storage of data will depend on the technology used for statistical, marketing and analytical purposes – in general, the period will not be longer than 26 months as of the	Providing data is not mandatory, however, it occurs automatically if the user interacts with our website. Providing data can be limited depending on the cookie settings used by the user and the consents for the use

		We also process your data for remarketing purposes, i.e. to serve targeted ads to users who visited or have taken action on our website. We use Google Analytics Advertising Features for this purpose.	In some cases, we may use your consent (Article 6(1)(a) GDPR for the processing of your data – in such a case you will be separately informed about it).	interaction of the user with our website.	of cookies granted by the user – see more in our cookie policy.
13	<b>Legal obligation</b>	We process your personal data to comply with legal obligations imposed on us, in particular resulting from accounting and tax provisions.	Processing is necessary to comply with legal obligations of SWSA (Article 6(1)(c) GDPR).	Personal data will be stored for periods resulting from mandatory law provisions.	Providing data is mandatory to comply with binding law provisions.
14	<b>Establishment, exercise or defense of claims</b>	Establishment and exercise of legal claims by SWSA or defense of legal claims.	SWSA's legitimate interest (Article 6(1)(f) or Article 9 (2)(f) GDPR) in establishing, exercising or defending legal claims.	Personal data will be processed for the period necessary to fulfill this objective.	Providing data is voluntary, however, if you fail to provide the data the controller may use legal measures to obtain the data.

#### IV. Recipients

Data may be transferred to SWSA's services providers, including in particular providers of IT services and solutions (including hosting), external advisors, providers rendering legal, accountancy and audit services, parcel delivery services, banks, subcontractors, clients, recruitment management system providers, entities providing recruitment support services, marketing agencies, as well as to companies belonging to the same capital group as SWSA.

#### V. Transfers outside the European Economic Area

Due to the international character of SWSA's activity, your personal data may be transferred to countries outside the European Economic Area, in which the personal data protection standards differ from the European Union's standards and which may not secure a proper level of protection of your personal data due to non-implementation of certain safeguards aimed at securing personal data. SWSA will take appropriate steps to make sure that such transfers comply with

applicable law, in particular transfers will be made to countries ensuring an adequate level of protection (based on the adequacy decisions of the European Commission), suitable safeguards based on Art. 46 GDPR will be secured or processing will be based on Art. 49 (in particular - transfer necessary for the performance of a contract). You may obtain a copy of the safeguards by contacting SWSA.

## VI. Source of personal data

Personal data is collected directly from the data subject except for:

- 1) contact persons and persons representing the other party to the contract – data may be collected from the entity with which a contract is to be concluded/was concluded, data may be acquired from publicly available databases (e.g. National Court Register, Central Register and Information on Economic Activity). The extent of the personal data is limited to the extent necessary for the conclusion and execution of the contract and does not normally include information other than name, ID or PESEL number, tax identification number and business contact details.
- 2) users of Lead Generation portals - SWSA processes your personal data in the form of name and surname, the e-mail address you provided as part of your registration on the Lead Generation portals, the name of the entity you represent, your country and city registered on the Lead Generation portals and the period during which you visited the SWSA stand on the Lead Generation portals. SWSA received the personal data from the operator of these portals.
- 3) job candidates – data may be collected from recruitment agencies (if engaged for recruitment). The extent of personal data is basically limited to name(s) and surname(s), date of birth, contact details indicated by you, as well as information about your education, professional qualifications and previous employment history.

## VII. Data subjects' rights

Data subjects have the following rights associated with SWSA processing their personal data:

- 1) **The right to object** against the processing of personal data – the right allowing the data subject to object to the processing of personal data based on legitimate interest. You can use this right e.g. when personal data is processed for the purposes of direct marketing (including using data profiling methods) or in other cases (however, then on grounds relating to your particular situation).
- 2) **The right to access and rectify data** – you have the right to request information about the processing of your personal data, in particular whether your personal data is processed, what type of personal data is processed, how long they will be processed and with which entities it was shared. You can exercise the right to rectify the personal data if the personal data needs to be updated, if it is incorrect or incomplete.
- 3) **The right to request deletion of personal data.** This right may be exercised in particular, when a personal data processed is no longer necessary in relation to the purposes for which it was collected or otherwise processed or when the personal data has been unlawfully processed.
- 4) **The right of data portability** – you have the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format and have the right to transmit the data to another controller without hindrance from us. This right may be exercised if processing is based on consent or on a contract and the processing is done by automated means.
- 5) **The right to restriction of processing** – you can request to have your personal data processing restricted. This right may be exercised in the following situations:
  - the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
  - the processing is unlawful and you oppose the deletion of the personal data and request the restriction of its use instead;
  - we no longer need the personal data processing, but it is required by you to establish, exercise or defend legal claims;
  - you have objected to processing pursuant to Article 21(1) GDPR pending verification whether our legitimate grounds override yours.

- 6) If processing is based on consent, you have **the right to withdraw your consent** at any time by contacting us at [RODO@secowarwick.com](mailto:RODO@secowarwick.com) or via a dedicated link available in the marketing communication sent to you (if any). Withdrawing your consent will not affect the lawfulness of personal data processing based on your consent before its withdrawal.

The possibility to exercise these rights may depend on the basis on which a given category of data is processed.

The data subject also has **the right to lodge a complaint** with the data protection supervisory authority (which in Poland is the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych)). Information about competent supervisory authorities for other countries is available at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

### **VIII. Automated decision-making**

Your personal data is not processed in a manner related to automated decision-making, including profiling.

### **IX. Contact**

For all matters related to the processing of personal data by SWSA, including the exercising of your rights, please contact us by sending a letter to our address or by email at: [RODO@secowarwick.com](mailto:RODO@secowarwick.com) (should you be dealing with another company from SECO/WARWICK group please see the contact details above).

### **X. Information on data processing by SECO/WARWICK S.A. Branch in Dąbrowa in relation to recruitment**

In case you are applying for a job at **SECO/WARWICK S.A. Branch in Dąbrowa** your data controller is SECO/WARWICK S.A. Oddział in Dąbrowa, ul. Innowatorów 8, 62-070 Dąbrowa. You may contact the branch by sending a letter to the indicated address or by sending an e-mail to [RODO@secowarwick.com](mailto:RODO@secowarwick.com). Your personal data is processed for purposes indicated in section III point 2 above and sections IV-VIII above apply accordingly (references to SWSA shall be understood as referring to SECO/WARWICK S.A. Oddział in Dąbrowa).