

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

### **I. Personal Data Administrator**

1. The Administrator of personal data within the meaning of art. 4 point 7 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 the repeal of Directive 95/46/EC (General Data Protection Regulation, GDPR) is AKTIM Sp. z o.o. company with its registered office in Krakow at ul. Braterska 12, 30-802 Krakow, Poland VAT: 6790084772, REGON: 003872380, entered into the register of entrepreneurs of the National Court Register under KRS number: 0000151916, registration court: District Court for Kraków Śródmieście in Kraków, XI Commercial Division of the National Court Register, share capital: PLN 100,000.00.
2. E-mail address of the Data Administrator: [aktim@aktim.com.pl](mailto:aktim@aktim.com.pl).
3. The Administrator in accordance with art. 32 sec. 1 GDPR complies with the principle of personal data protection and applies appropriate technical and organizational measures to prevent accidental or unlawful destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data processed in connection with the business.
4. Providing personal data is voluntary, but necessary to establish cooperation and/or conclude a contract with the Data Administrator.
5. The Data Administrator processes personal data to the extent necessary to perform the contract and provide services to the data subject.

### **II. Purpose and basis of personal data processing**

1. The Administrator processes personal data for the following purposes:
  - a) preparation of a commercial offer in response to the customer's interest, which is the legitimate interest of the Data Administrator (Article 6(1)(f) GDPR);
  - b) conclusion and performance of contracts, including contacting in matters related to the performance of the contract, based on the concluded contract (Article 6(1)(b) GDPR);
  - c) handling the complaint process, based on the obligation of the Data Administrator in connection with applicable law (Article 6(1)(c) GDPR);
  - d) making payments under contracts, based on a concluded contract (Article 6(1)(b) GDPR);
  - e) implementation of tax obligations as well as bookkeeping and accounting obligations, based on the provisions of tax law (Article 6(1)(c) GDPR);
  - f) data archiving for the purposes of proving facts, as well as possible determination, investigation or defense against claims, which is the legitimate interest of the Data Administrator (Article 6(1)(f) GDPR);
  - g) contact by phone or via e-mail, in particular in response to inquiries addressed to the Data Administrator, which is the legitimate interest of the Data Administrator (Article 6(1)(f) GDPR);
  - h) marketing of own services, which is the legitimate interest of the Data Administrator (Article 6(1)(f) GDPR) or based on the consent granted (Article 6(1)(a) GDPR).

### III. Data recipients. Data transfer to third countries

1. The recipients of personal data processed by the Data Administrator may be entities cooperating with the Data Administrator when it is necessary for the performance of the contract concluded with the data subject.
2. The recipients of personal data processed by the Data Administrator may also be subcontractors - entities whose services are used by the Data Administrator when processing data, e.g. law firms, entities providing IT services (including hosting services).
3. The Data Administrator may be required to disclose personal data on the basis of applicable law, in particular to disclose personal data to authorized state authorities or institutions.
4. Personal data will not be transferred to entities based outside the European Economic Area.

### IV. Period of personal data storage

1. The Data Administrator stores personal data for the duration of the contract concluded with the data subject and after its termination for purposes related to the pursuit of claims related to the contract, performance of obligations under applicable law, but for no longer than the limitation period in accordance with the regulations of the Civil Code.
2. The Data Administrator stores personal data contained in accounting documents (eg invoices) for the period of time specified by the provisions of tax law.
3. The Data Administrator processes personal data for marketing purposes until the consent to data processing is withdrawn, but not longer than 10 years.
4. The Data Administrator stores personal data for purposes other than those indicated in par. 1-3 for a period of 3 years, unless the consent to data processing has been withdrawn previously and the data processing cannot be continued on a basis other than the consent of the data subject.

### V. Rights of the data subject

1. Each data subject has the right to:
  - a) **access** - obtaining confirmation from the Administrator whether or not their personal data is being processed. If data about a person is processed, he or she is entitled to access them and obtain the following information: about the purposes of processing, categories of personal data, information about recipients or categories of recipients to whom the data has been or will be disclosed, about the period of data storage or about their criteria determining the right to request rectification, deletion or limitation of the processing of personal data due to the data subject, and to object to such processing (Article 15 GDPR);
  - b) **to receive a copy of the data** - to obtain a copy of the data subject to processing, the first copy being free of charge, and the Administrator may charge a reasonable fee for subsequent copies, resulting from administrative costs (Article 15(3) GDPR);
  - c) **to rectify** - requesting rectification of incorrect personal data concerning him or her, or supplementing incomplete data (Article 16 GDPR);
  - d) **to delete data** - request to delete their personal data, if the Administrator no longer has a legal basis for their processing or the data is no longer necessary for the purposes of processing (Article 17 GDPR);

- e) **to limit processing** - requests to limit the processing of personal data (Article 18 GDPR), when:
- the accuracy of the personal data is contested by the data subject - for a period enabling the Administrator to verify the accuracy of the data,
  - the processing is unlawful and the data subject opposes their removal, requesting the restriction of their use,
  - the Administrator no longer needs these data, but they are needed by the data subject to establish, assert or defend claims,
  - the data subject has objected to the processing - pending verification whether the legitimate grounds of the Administrator override those of the data subject;
- f) **to transfer data** - to receive in a structured, commonly used machine-readable format personal data concerning him, which he provided to the Administrator, and request to send these data to another Administrator, if the data is processed on the basis of the consent of the data subject or a contract with contained therein and if the data is processed in an automated manner (Article 20 GDPR);
- g) **to object** - to object to the processing of his or her personal data for the legitimate purposes of the Administrator, for reasons related to his or her particular situation, including profiling. Then the Administrator, assesses the existence of valid, legitimate grounds for processing that override the interests, rights and freedoms of data subjects, or the grounds for establishing, investigating or defending claims. If, according to the assessment, the interests of the data subject override those of the Administrator, the Administrator will be obliged to stop processing the data for these purposes (Article 21 GDPR).
2. In order to exercise the above-mentioned rights, the data subject should contact the Administrator using the contact details provided and inform him which right and to what extent he wants to exercise.
3. The data subject has the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection in Warsaw.

### **VI. Automated decision making. Profiling**

Personal data will not be processed automatically, including through profiling.

Sincerely,  
**AKTIM Sp. z o.o.**