



## NOTICE ON PROCESSING OF YOUR PERSONAL DATA

The Konspol Group cares for your privacy – we process and store your personal data in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27th 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 (the General Data Protection Regulation) (OJEU L 119/1; hereinafter referred to as the GDPR). Therefore, please be informed of the following.

### I. Personal Data Controller

We, Konspol Holding Sp. z o.o., with our registered office in Nowy Sącz, ul. Grotgера 40 (33-300 Nowy Sącz), are the Controller of your personal data.

### II. Data Protection Officer

We appointed the Data Protection Officer, whom you may contact in issues related to the protection of your personal data and exercising your rights by e-mail: [IODO@konspol.com.pl](mailto:IODO@konspol.com.pl) or by sending a letter to our registered address indicated in Sec. I.

### III. Purposes and basis for processing

Your data are processed by us for the following purposes and on the following basis:

- 1) if you are our past, present or prospective **business partner, supplier, customer or a representative of such an entity**:
  - a. for the purpose of conclusion and due performance as well as settlement of potential contract(s) which may be entered into in the future by you or an entity represented by you and us for the purpose of maintaining business relations, which also constitutes our justified interest (legal basis: Article 6(1)(b)(f) of the GDPR);
  - b. for the purpose of ensuring safety and quality of our products, which constitutes our legal obligation (pursuant, among others, to the food and nutrition safety act of 25th August 2006 and Regulation (EC) no. 853/2004 of the European Parliament and of the Council of 29th April 2004 laying down specific hygiene rules for on the hygiene of foodstuffs as well as to our legitimate interest (legal basis: Art. 6(1)(c)(f) of the GDPR);
  - c. for the purpose of marketing of own products and services consisting in promoting own products and services, promoting the Konspol capital group, determining Customers' preferences, presenting information on various undertakings, which constitutes our legitimate interest (Article 6(1)(b)(f) of the GDPR);
  - d. for the purpose of considering and documenting complaints, which is connected with the agreements concluded and which constitutes our legitimate interest (Article 6(1)(b)(f) of the GDPR);
  - e. for archiving (evidence) purposes in order to secure information in case of legal necessity to demonstrate evidence, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
  - f. for the purpose of making, pursuing and defending against claims, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
  - g. for internal administrative purposes within the Konspol capital group, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
- 2) if you are a **job candidate** and have submitted your application with us:
  - a. for the purpose of conducting the recruitment procedure, which, for data indicated in Art. 22<sup>1</sup> of the Polish Labour Code, is conducted pursuant to this provision of the law

- (Art. 6(1)(c) of the GDPR); the data not indicated in the provisions of the Polish Labour Code, are processed pursuant to your consent (Art. 6(1)(a) of the GDPR);
- b. for the purpose of conducting future recruitment – pursuant to your consent for data processing in future recruitment procedures;
  - c. for the purpose of making, pursuing and defending against claims, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
  - d. for internal administrative purposes within the Konspol capital group, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
- 3) if you are a **participant of a contest organised by us**:
    - a. for the purpose of conducting (and distributing prizes in) the contest organised by us – based on your consent (Art. 6(1)(a) of the GDPR);
    - b. for the purpose of making, pursuing and defending against claims, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
    - c. for internal administrative purposes within the Konspol capital group, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
  - 4) if you filed an **application with us not connected directly with our business activity**:
    - a. for the purpose of reviewing, considering and potential realisation of the application – processing based on your consent and in accordance with your vested interest (Art. 6(1)(a)(d) of the GDPR);
    - b. for internal administrative purposes within the Konspol capital group, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);
    - c. for the purpose of making, pursuing and defending against claims, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR);

#### IV. Data recipients

- 1) if you are our past, present or prospective **business partner, supplier, customer or a representative of such an entity** – your personal data may be made available to employees and entities from the Konspol capital group, to our customers, suppliers and subcontractors as well as trade partners with which we maintain cooperation (among others: law firms, hosting companies, IT solution suppliers, insurance brokers);
- 2) if you are a **job candidate** and have submitted your application with us – your personal data may be made available to employees and entities from the Konspol capital group;
- 3) if you are a **participant of a contest organised by us** – your personal data may be made available to employees and entities from the Konspol capital group;
- 4) if you filed an **application with us not connected directly with our business activity** – your personal data may be made available to employees and entities from the Konspol capital group.

#### V. Transferring data to third countries and international organisations

- 1) if you are our past, present or prospective **business partner, supplier, customer or a representative of such an entity** – in principle, we do not transfer your data outside of the European Economic Area. The data may be transferred only if it is necessary for the fulfilment of the purpose for which they are processed (in particular, to perform a contract) and only if an appropriate data protection measures are provided. You are allowed to obtain information on such data, place of their disclosure and the applied protection measures.
- 2) if you are a **job candidate** and have submitted your application with us – we do not transfer your data outside of the European Economic Area;
- 3) if you are a **participant of a contest organised by us** – we do not transfer your data outside of the European Economic Area;
- 4) if you filed an **application with us not connected directly with our business activity** – we do not transfer your data outside of the European Economic Area.

## VI. Profiling and automated decision making

Your data are not used for automated decision making, including profiling.

## VII. Data storage period

- 1) if you are our past, present or prospective **business partner, supplier, customer or a representative of such an entity** – your data, collected for the purposes specified in Sec. III Item 1, are stored by us for the duration of our cooperation (maintaining business relations) and until expiration of claims related to the contract or public claims;
- 2) if you are a **job candidate** and have submitted your application with us – your data, collected for the purposes specified in Sec. III Item 2, are stored by us until the end of the recruitment process, not longer than 6 months of receiving your application documents, If you consent to the processing of your data in future recruitment procedures, the data will be stored for the period of 2 years of receiving the application documents;
- 3) if you are a **participant of a contest organised by us** – your data, collected for the purposes specified in Sec. III Item 3, are stored by us until the end of a given contest and distribution of prizes, not longer than for 6 months of the resolution of the contest. If you were awarded a prize from us, your data is stored by us until expiration of claims related thereto or public claims (statutory charges);
- 4) if you filed an **application with us not connected directly with our business activity** – your data, collected for the purposes specified in Sec. III Item 4, are stored by us until a decision is reached concerning the handling of the application, not longer than for 2 months of receiving your application. Subject to the above indicated period, if the data were/are processed for accounting and taxation purposes, we process the data for 5 years, calculated from the end of the calendar year in which the tax obligation has arose.

## VIII. Your rights:

You may:

- 1) access your data and obtain their copies;
- 2) rectify (correct) your data;
- 3) remove your data. If, according to you, there is no reason for processing your data by us, you may ask us to remove them;
- 4) limit the scope of processing of your data: you may ask us to limit the processing of your data to their storage and performing activities agreed with you, if, according to you, your data kept by us are incorrect or if we process them groundlessly, or if you do not want us to delete them as you need them for the purpose of making, pursuing and defending claims, or for the time of your appeal against your data being processed (Article 18 of the GDPR).
- 5) transfer the data: you may receive your personal data you provided us with or you can order us to send these data directly to another entity;
- 6) object: to your data being processed for reasons attributable to your particular situation. In such an event, you should give us grounds for discontinuation of processing subject to such objection. We will cease to process your data for these purposes, unless we demonstrate that the grounds for processing of your data are imperative to your rights or we need your data to make, pursue and defend claims.  
You may also object to the processing of your data for the direct marketing purposes. If you decide to exercise this right, we will cease processing your data;
- 7) file a complaint with a supervisory body: If you believe that your data are processed by us unlawfully, you may file a complaint with the President of the Office for Personal Data Protection or other competent supervisory body.

#### IX. Information about obligatory/voluntary data provision

- 1) if you are our past, present or prospective **business partner, supplier, customer or a representative of such an entity** – the provision of data by you is voluntary, but required by us for the purposes indicated in Sec. III Item 1, in particular for the purpose of performing the contract(s) concluded by us and maintaining business relations. If you do not provide us with your data or you delete them, we will not be able to complete these purposes, perform contract(s) and conclude any further contracts.
- 2) if you are a **job candidate** and have submitted your application with us – the provision of data by you is voluntary, but required by us in particular for the purpose of conducting the recruitment procedure. Deciding not to provide your data or withdrawing your consent will render your participation in the recruitment procedure and future recruitment procedures impossible.
- 3) if you are a **participant of a contest organised by us** – the provision of data by you is voluntary, but required by us for your participation in the contest and for the purpose of potential distribution of prizes. Deciding not to provide your data or withdrawing your consent before the resolution of the contest or distribution of prizes will render your participation in the contest and receiving a potential prize impossible.
- 4) if you filed an **application with us not connected directly with our business activity** – the provision of data by you is voluntary, but required by us for the purpose of considering and potential realisation of your application. Deciding not to provide your data or withdrawing your consent will render the access to, consideration and potential realisation of your application impossible.

Any matters related to the processing of your personal data and the corresponding entitlements should be addressed to the Inspector for the Protection of Personal Data electronically to the Officer's e-mail address indicated in Sec. II or in print to our registered office address indicated in Sec. I.