

## PERSONAL INFORMATION PROCESSING POLICY

Definitions:

**Administrator** - DFM Europe sp. z o.o with its seat in Gdańsk (postal code: 80-307), ul. Antoniego Abrahama 1A, entered into register of entrepreneurs kept by District Court of Toruń, VII Commercial Division under KRS 0000665090, REGON 366624352, NIP 8762468065,

**Personal information** - all information about a natural person identified or identifiable by one or more specific factors defining the physical, physiological, genetic, psychological, economic, cultural or social identity of a natural person, including image, voice recording, contact data, location data, data included in correspondence or data gathered with recording appliances or any similar technology.

**Policy** - this Personal information processing policy

**GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 7 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC

**Person whose data is processed** - any natural person whose personal information is processed by Administrator (e.g. our clients, anyone visiting our facility or corresponding with us)

1. In connection with commercial activity conducted, Administrator collects and processes personal data in compliance with applicable legislations, especially GDPR, and data processing rules they include.
2. Administrator provides transparency of data processing, always informing about processing of the data when it is collected, as well as about the purpose and legal basis of the processing.
3. It is possible to contact the Administrator via e-mail [kadry@dfm-europe.eu](mailto:kadry@dfm-europe.eu) or by mail sent to DFM EUROPE Sp. z o. o. , 80-307 Gdańsk, ul. Antoniego Abrahama 1A
4. In order to provide data integrity and privacy, Administrator implemented the procedures giving access to data only to the authorized persons and only to an extent needed for their responsibilities. Administrator implements organizational and technical solutions in order to assure that all operations regarding personal information are both registered and performed by persons authorized.
5. Furthermore, the Administrator undertakes all actions necessary for his subcontractors and other parties to guarantee to implement adequate safety measures whenever they process personal information. Administrator conducts an up to date risk analysis and monitors the adequacy of safety features used to the identified threats.
6. For the correspondence sent to Administrator via email or postal service, the information contained in such correspondence are processed solely for the purpose of communication and resolving issues regarded by the correspondence or related matters. The legal basis for the processing is a justified interest of Administrator (art. 6 paragraph 1 point f of GDPR), consisting of conducting correspondence directed in connection to the conducted activity. All the correspondence is stored in a manner providing safety of personal information it contains and all other data, and accessed only by the authorized persons.
7. When contacted via phone, Administrator may request personal data only if it is necessary for handling the matter concerned. The legal basis for the processing is a justified interest of Administrator (art. 6 paragraph 1 point f of GDPR), consisting of the necessity of resolving the concerned matter in connection with the conducted activity.
8. In order to assure safety for people and property, Administrator may use video surveillance and control access to premises and sites administered.



Data collected in such a way is not used for any other purpose. Personal data consisting of video surveillance recordings and data collected in comings and goings registry are processed in order to maintain safety and order at the site and, if necessary, for legal defence or redress. The legal basis for the processing is a justified interest of Administrator (art. 6 paragraph 1 point f of GDPR).

**9.** As a part of processes of recruitment, Administrator expects to be provided with personal data only to an extent defined in labour law. Due to this, any personal data beyond such extent should not be provided. In case when an application would contain such additional information, these information will not be used nor considered in the process of recruitment nor for any other purpose. Personal information are processed in the following purposes:

a) to fulfil the duties defined by law in connection with the employment process, especially by Labour code - based on art. 6 paragraph 1 point c of GDPR in connection with the Labour code laws;

b) to conduct the process of recruitment in the scope of data not requested by the law, as well as for future recruitations - based on art. 6 paragraph 1 point a of GDPR;

c) to establish or redress possible claims or defend against such - based on art. 6 paragraph 1 point f of GDPR.

**10.** In case of data collected in order to execute a contract, Administrator provides the person whose data is concerned with detailed information about the processing of their data not later than at the moment of concluding the contract

**11.** In connection with the activity conducted, Administrator also collects personal information, e.g. during business meetings, business sector events, or by exchange of business cards - in order to establish and maintain business contacts. The legal basis is a justified interest of Administrator (art. 6 paragraph 1 point f of GDPR), consisting of creating a net of contacts in connection with the conducted activity. Personal data collected in such ways are processed only for the purpose for which they were collected, with adequate security being provided.

**12.** In connection with conducting activity that requires personal information processing, the information may be revealed to external parties, including those operating informatic systems and hardware, parties providing legal and accounting services, delivery people, or marketing or recruiting agencies. Data may also be revealed to associated parties. Data may only be revealed to appropriate organs or third parties submitting a request for such data based on an adequate legal basis and in concordance with applicable law.

**13.** The degree of personal information protection outside the European Economic Area (EEA) differs from that provided by European law. Due to this, Administrator passes personal data outside the EEA only when it is necessary, providing an adequate degree of security.

Administrator always informs about an intention of passing personal information outside the EEA when it is collected.

**14.** The data processing period depends on the purpose of the processing and may be based on the law if it is the basis of the processing. In case of data processing based on justified interest of Administrator, data is processed during a period that allows its realization or until an effective objection against the processing is submitted. If the processing is based on an agreement, the data is processed until the agreement is withdrawn. If the basis for the processing is the indispensability for the conclusion and execution of the contract, the data will be processed until its termination.

**15.** The data processing period may be prolonged if the processing is indispensable for determining, investigation or defence against possible claims, and after that period only in a situation and to an extent defined by law. After the processing period data is irreversibly deleted or anonymised.



**16.** The persons whom the information regard have the following rights.

- a)** right to be informed about personal data processing - Administrator provides an information about data processing, including purposes and legal bases of processing, the extent of the data possessed, the parties to which the data is revealed and intended time of their deletion;
- b)** right to get a copy of the data - Administrator passes a copy of the processed data regarding the person submitting a request;
- c)** right to correction - on request of the person who does the data regard, Administrator removes mismatches or errors of the data processed and completes it if it is incomplete;
- d)** right for data removal - it may be requested to remove data which processing is no longer necessary for any of the purposes for which it was collected;
- e)** right to limit the processing - in case of such request, Administrator stops performing operations regarding concerned data and storing it until the causes of data processing limiting cease (for example, a supervisory authority decides that the data may be further processed);
- f)** right to transfer the data - to an extent to which it is processed in an automated way or in connection with a contract or an agreement, Administrator will pass the data provided by the person whom does it regard in a format allowing it to be read by a computer. It may also be requested for the data to be passed to an another party - but only if it is technically possible both on the side of Administrator and that party;
- g)** right for objection against processing data for the purpose of direct marketing - at any moment a person may object against processing their personal data for the purpose of direct marketing, with no need to justify such objection.
- h)** right for objection against other purposes of data processing - a person who does the data regard may at any moment object against processing their data due to causes connected with their special situation - provided that Administrator processes their data based on a justified interest of the Administrator (which is, based on art. 6 paragraph 1 point f of GDPR, e.g. for analytic or statistical purposes or for causes connected with protection of property). Such an objection should contain a proper justification.
- i)** right to withdraw the agreement - if the data is processed based on a given agreement, a person, who does the data regard may withdraw it at any time, which however does not interfere with legality of the processing that took place before the withdrawal of the agreement.
- j)** a right for filing a complaint - if the data processing would be considered to be against the GDPR or other personal information protection regulations, the person, who does the data regard, may file a complaint to the President of the Office for Personal Data Protection.

**17.** A claim or request in regard to the implementation of the rights may be submitted in written form - by email sent to [kadry@dfm-europe.eu](mailto:kadry@dfm-europe.eu) or by postal service sent to DFM EUROPE Sp. z o. o. 80-307 Gdańsk, ul. Antoniego Abrahama 1A. The answer is given in written form unless the claim/request was submitted via email or demanded the answer to be conveyed by electronic means. In case of doubt regarding the identity of a person submitting a request via email, Administrator reserves a right to verify the identity.

