

PRINCIPLES FOR PROCESSING PERSONAL DATA IN CONNECTION WITH ONGOING ELECTRONIC CORRESPONDENCE WITHIN THE PFEIFER & LANGEN GROUP IN POLAND

Please find below information on how, for what purposes and to what extent we process your personal data in connection with e-mail correspondence with employees and representatives of the Pfeifer & Langen Group in Poland.

WHO ARE WE?

We are the Pfeifer & Langen Group in Poland, consisting of the companies Pfeifer & Langen Polska S.A. and Pfeifer & Langen Marketing sp. z o.o.. We have our registered office in Poznań at ul. A. Mickiewicza 35, 60-837 Poznań (hereinafter: **We**). You can contact our Data Protection Officer, Mr Tomasz Grzybowski, by email at iod@diamant.pl or by post at Pfeifer & Langen Group in Poland, 35 A. Mickiewicza Street, 60-837 Poznań.

WHY THIS DOCUMENT?

On 25 May 2018, the regulations of the General Data Protection Regulation (referred to as: GDPR) came into force. The GDPR for cases of personal data collection imposes an obligation to provide comprehensive information on how the collected data is processed. In light of the GDPR, when we receive a message from you from a certain email address, with a certain content, with a signature, we collect personal data. In this document, we are providing you with the legally required information and thereby fulfilling our legal obligation under the GDPR.

WHERE DO WE GET YOUR PERSONAL DATA FROM?

We obtain your personal data mainly from you. You provide us with your data in connection with our email correspondence. At the same time, we may have obtained your contact details from someone in your organization (e.g. by naming you in the cooperation agreement as the contact person or simply by adding you to the message (CC) as part of ongoing correspondence).

FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

We process the data you provide for a purpose related to the correspondence in question. This may be the performance of services by us, the ordering of certain services or supplies, recruitment, or any other activity related to our business. If you are our customer, potential customer or its representative, we will also process your data for marketing purposes.

TO WHAT EXTENT DO WE PROCESS YOUR PERSONAL DATA?

We process your data to the following extent : your e-mail address and the data contained by you in the correspondence you send to us (customarily the subject matter of the correspondence and the footer with contact details).

ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA?

We process your data for the performance of a contract that binds us, or for the purpose of entering into a contract. If you wish to be employed by us, we process your data provided for the purposes of recruitment on the basis of your consent, which you have given by applying for the recruitment process and sending your CV or other application documentation. If you are a representative of a state institution, we process your data in order to comply with a legal obligation or to obtain the necessary information, related to the subject of our activity (accounting, HR and payroll services).

HOW LONG DO WE PROCESS YOUR PERSONAL DATA?

We process data from e-mail correspondence for the duration of its usefulness for mutual contacts. We do not have a specific time period after which we absolutely delete all correspondence. However, if we terminate the relationship or simply do not enter into it, we will keep your data for a further 5 years (in the name of the accountability rule) and then decide whether it is appropriate to delete it.

WHO IS THE RECIPIENT OF YOUR PERSONAL DATA?

We do not share your data on a proprietary basis with any commercial entities. You should know, however, that your data may be shared with other Pfeifer & Langen Group companies in the European Union and service providers whose services entail the right to access your data:

- a. legal, tax and accounting advice offices
- b. to those who maintain the software we use to conduct our correspondence and save important information
- c. entities operating our IT systems
- d. to our subcontractors and sales agents with whom we have contracts for entrustment of data processing, if the content of the correspondence indicates a need on our part to perform a specific service.

We only provide each subcontractor with data that is necessary for the purpose in question.

WHAT RIGHTS DO YOU HAVE?

Data protection law gives you a number of rights that you can exercise at any time. Provided you do not abuse these rights (e.g. unreasonable daily requests for information), the exercise of these rights will be free of charge for you and should be easy to do.

Your rights include:

a) **Right of access to the content of your personal data**

This right means that you can request that we export the information we have about you from our databases and send it to you in one of the commonly used formats (e.g. XLSX, DOCX, etc.).

b) **Right of rectification**

If you become aware that the data we process is inaccurate, you have the right to ask us to correct it and we will be obliged to do so. In such a case, we have the right to ask you to provide some document or other evidence of the data change.

c) **Right to restrict data processing**

If you consider that we process too much of your personal data for a specific process, you have the right to request that we limit this processing. Insofar as your request does not oppose the requirements imposed on us by applicable law, or is not necessary for the performance of a contract, we will comply with your request.

d) **Right to request deletion of data**

This right, also known as the right to be forgotten, means your right to request that we delete any information containing your personal data from our database systems and from our records. Please note that we will not be able to do this if we are obliged by law to process your data (e.g. maintenance of employee records, tax returns). In any case, however, we will delete your personal data to the fullest extent possible and, where this is not possible, we will ensure that your data is pseudonymized (meaning that the data subject cannot be identified without an appropriate linkage key), so that your data, which we must retain in accordance with applicable law, will only be accessible to a very limited circle of people within our organization.

e) **Right to data portability to another data controller**

In accordance with the General Data Protection Regulation, you can ask us to export the data you have provided to us in the course of all our contacts and all our cooperation into a separate file for onward transmission to another data controller.

You can exercise the rights referred to above by contacting us at e-mail iod@diamant.pl or by writing to Pfeifer & Langen Group in Poland, ul. A. Mickiewicza 35, 60-837 Poznań.

You may also write to us if an action or situation you encounter raises concerns as to whether it complies with the law or whether it inadvertently infringes your rights or freedoms. If this is the case, we will respond to your questions and concerns and address the issue immediately.

If you consider that we have in any way violated the rules on the processing of your personal data then **you have the right to lodge a complaint directly with the supervisory authority** (as of 25 May 2018, this is the President of the Office for Personal Data Protection). In exercising this right, you should provide a full description of the situation that has arisen and indicate what action you consider to have violated your rights or freedoms. The complaint should be submitted directly to the supervisory authority.

RIGHT TO OBJECT

Separately, we would like to inform you that you also have the right to so-called objection to the processing of your personal data.

You file a right of objection when you do not want us to process your personal data for a specific purpose. In this case, we will continue to process your data for other processes (for other purposes),

but no longer for the purpose for which you have raised an objection, unless your request opposes an obligation imposed on us by law.

You can submit your right of objection by emailing iod@diamant.pl or by writing to Pfeifer & Langen Group in Poland, ul. A. Mickiewicza 35, 60-837 Poznań.