

Detailed Information on Personal Data Processing by ELA-COMPIL SP. Z O.O.

As you may already know, on May 25, 2018, new provisions on the protection of personal data (GDPR) entered into force - Regulation (EU) 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. Therefore, we would like to inform you that your personal data is stored in our database and is processed according to the principles described herein.

INFORMATION APPLICATION SCOPE

This Information on the processing of personal data by companies from ELA-COMPIL SP. Z O.O Group applies to the data received:

- in person (employees, former employees, associates)
- by electronic forms,
- in business contacts, contracts with customers or suppliers (only contact details), and by representatives of ELA-COMPIL SP. O.O in purchasing, sales or marketing activities (e.g. as part of meetings or business correspondence, conferences or other events, tenders, negotiations, etc.)

Personal data controller

The controller of your personal data is **ELA-COMPIL SP. Z O.O** with its registered office in Poznań, 60-541 ul. Szczepanowskiego 8.

Contact details in matters relating to personal data

Inquiries or requests related to the processing of personal data by companies from the ELA-COMPIL SP. Z O.O Group shall be sent to contact details provided below:

ELA-COMPIL SP. Z O.O 60-541 Poznań, ul. Szczepanowskiego 8.

E-mail: p.wozniak@ela.pl

Personal data processed in "business contacts" folder

ELA-COMPIL SP. Z O.O. may receive contact details directly from the data subject (e.g. business cards, as a result of previous cooperation, in electronic forms, during fairs or conferences) or through other persons (e.g. from an employer, other employee or other entity that this person regularly works with).

If there is direct contact, you have full control over the scope of data made available to ELA-COMPIL SP. Z O.O.

Please be informed that your data is collected and processed in the "Contact database" file to facilitate the establishment of business contacts, contract performance and to send holiday wishes.

Your personal data shall be stored as long as it is necessary to perform the contract, and after that time the data shall be stored for a period of time corresponding to the period of limitation of claims that may be raised by the data controller, and which may be raised against the data controller.

Data from the "business contacts" file are not shared with other entities, except for entities authorized to request these data according to generally applicable laws.

If the data is provided by another person, ELA-COMPIL SP. Z O.O usually collects only basic contact details related to professional activity, including name, surname, e-mail address, telephone number, position or function, company and possibly other data resulting from a contract or an order in connection with which the personal data of the contact person is made available.

Purpose and legal grounds for the processing of your data:

- **PURPOSE:** performance of the contract or order,
- **FOUNDATIONS:** art. 6 sec. 1 point b) of GDPR

In the case of concluding a contract or an order between you and ELA-COMPIL SP. Z O.O., the data you provided will be processed for the purpose of performing such a contract or order and for the settlement.

- **PURPOSE:** business contacts,
- **FOUNDATIONS:** art. 6 sec. 1 point f) of GDPR

The representatives of ELA-COMPIL SP. Z O.O may contact you to present its offer, invite you to a meeting or event organized by ELA COMPIL SP. Z O.O or to under other marketing activities. From time to time you may receive information regarding products, services, or activities of ELA-COMPIL SP. Z O.O and other information related to our activities, including a corporate newsletter.

If you are a representative of a supplier or service provider, representatives of ELA-COMPIL SP. Z O.O may also contact you to obtain an offer, information, or documents.

In this case, your data will be processed to implement the legitimate interest of the controller, which is the marketing and sale of products and services and building and strengthening business relationships. You have the right to object to such processing of personal data.

- **PURPOSE:** answer for an inquiry,
- **FOUNDATIONS:** art. 6 sec. 1 point a) of GDPR

While sending an inquiry in any form, e.g. by e-mail, telephone, social network, you express your consent to contact for to the implementation of your request or inquiry.

- **PURPOSE:** fulfillment of the legal obligation to prepare and store documentation,
- **FOUNDATIONS:** art. 6 sec. 1 point c) of GDPR

During the performance of a contract or an order or other service for you, we will also process personal data included in invoices, accounting books or other documentation confirming the conclusion and performance of the contract to prepare and store documents in accordance with applicable law. It concerns the cases where you are a party to a contract or order, and where a party to the contract or order is your employer or an entity you cooperate with, or where any service has been provided for you (e.g. hotel reservation).

Personal data processed in the file "job applicants"

Please be advised that your personal data is collected and processed in the file "job applicants". Providing data is voluntary. Your personal data will be stored until the end of the recruitment process, and after that time for the next 6 months for the purpose of another recruitment.

Data from the "job applicants" file are not shared with other entities, except for ELA-COMPIL SP. Z O.O. and entities authorized to request these data according to generally applicable laws.

- **PURPOSE:** conducting the recruitment process
- **FOUNDATIONS:** your expressed consent

Personal data processed in the file "employees" - also applies to former employees of ELA-COMPIL SP. Z O.O.

Please be advised that your personal data is collected and processed in the file "employees" because of an obligation resulting from the provisions of the Labor Code. This and other data may also be processed for the purposes of payrolls, accounting, tax, social and health insurance matters, to the extent and according to the obligations arising from the generally applicable laws. Providing data in the scope specified in the Labor Code (section 221) is obligatory. Your personal data will be kept for the period resulting from the provisions of the Labor Code.

Data from the "employees" file are made available to entities from the ELA-COMPIL SP. Z O.O Group and entities authorized to receive this data according to provisions of the law. The data may also be made available (it includes name, surname, PESEL [Personal Identification Number], ID number, position, photo) to the Company's clients for the purpose of issuing a pass or permit to enter the facility or premises.

- **PURPOSE:** keeping employee documentation, payrolls, accounting, taxes, social and health insurance matters in the scope and according to the obligation resulting from the provisions of the Labor Code.

- **PURPOSE:** provisions of the Labor Code (sec. 22¹)

- **FOUNDATIONS:** performance of the employer's tasks resulting from superior provisions and the applicable Work Regulations

- **FOUNDATIONS:** employee's consent

Apart from the data which provision is mandatory and results from the Labor Code, other data may also be collected and processed in "employees" file, the collection and processing of this data is based on your voluntarily expressed consent, and concerns e.g. bank account number. In these cases, you have the right to withdraw your consent at any time in addition to the rights listed above.

A monitoring system is installed on the company's premises to ensure the employees' safety, protect property or to keep secrecy of information, where the disclosure of such information would expose the employer to losses. Monitoring data is stored for 30 days.

Data from the "employees" file are made available to entities authorized to receive this data according to the legal provisions. The data may also be made available (including name, surname, PESEL number, ID number, position) to the Company's clients for the purpose of issuing a pass or permit to enter the facility or premises.

Personal data processed in the file "associates"

Please be informed that your personal data is collected and processed in the file "associates" for the purposes of the performance of the contract concluded between you and ELA COMPIL SP. Z O.O. Your personal data shall be stored as long as it is necessary to perform the contract, and after that time the data shall be stored for a period of time corresponding to the period of limitation of claims that may be raised by the data controller, and which may be raised against the data controller

This and other data may also be processed for the purposes of payrolls, accounting, tax, social and health insurance matters, to the extent and according to the obligations arising from the generally applicable laws

- **PURPOSE:** performance of the contract concluded between you and **ELA-COMPIL SP. Z O.O**

- **FOUNDATIONS:** civil law contract

Personal data processed in the file "participants of training courses"

Please be informed that your personal data is collected and processed in the file "participants of training courses " for the purposes of implementing the contract concluded between you and ELA-COMPIL SP. Z O.O. Your personal data shall be stored as long as it is necessary to perform the contract, and after that time the data shall be stored for a period of time corresponding to the period of limitation of claims that may be raised by the data controller, and which may be raised against the data controller.

This and other data may also be processed for marketing purposes, provided that prior consent is given for this purpose, and until such consent is withdrawn.

- **PURPOSE:** performance of the contract concluded between you and the **ELA-COMPIL SP. Z O.O.**; marketing activities (after prior consent)
- **FOUNDATIONS:** contract / order; separate consent to the use of data and image for marketing purposes

Entitlements

In accordance with the GDPR provisions, you shall have the right to:

1. access the data;
2. rectify the data;
3. delete the data;
4. limit data processing;
5. transfer the data;
6. raise an objection (where the legitimate interest of the controller is the basis for data processing);
7. withdraw consent (where the consent is the basis for data processing)

within the scope resulting from the GDPR

You also have the right to lodge a complaint with the competent supervisory authority - the President of the Personal Data Protection Office.