

Personal data processing at Oxytop Sp. z o.o.

**Information clause for the website**

**Dear All,** pursuant to the provisions of the Regulation (Eu) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the GDPR), we provide you with information regarding the use of your personal data.

**Who is the Controller of your personal data?**

The Controller of your personal data is Oxytop Sp. z o.o. with its registered address at ul. Antoninek 2, 62-060 Stęszew, Poland, NIP [Tax Identification Number]: 779-00-17-718, REGON [National Business Registry Number]: 630055654 KRS [National Court Register Number]: 0000179032

**How to contact us for information about your personal data?**

The Controller can be contacted in writing by traditional mail at the address given above or by email at: [biuro@oxytop.pl](mailto:biuro@oxytop.pl).

**How do we keep your personal information secure?**

We ensure that all measures of physical, technical, and organisational protection of personal data are taken against their accidental or deliberate destruction, accidental loss, alteration, unauthorised disclosure, use or access in accordance with all applicable regulations.

We have appointed a Data Protection Officer, Mr Dominik Giętkowski, who can be contacted at: [iod@oxytop.pl](mailto:iod@oxytop.pl).

**What is the purpose and legal basis for processing your personal data?**

We process your personal data for the following purposes:

Area	Purpose and legal basis of processing
<p><b>Activities to conclude and perform a contract as well conducting a business:</b></p>	<ul style="list-style-type: none"> <li>• to conclude or perform a contract (including for the purposes of contact, billing and payments necessary for its performance) or to take steps at your request in order to conclude it (<b>Article 6(1)(b) of the GDPR</b>) or to contact the contractor's employees in order to perform the contract (<b>Article 6(1)(f) of the GDPR</b> – the legitimate interest is the performance of the contract),</li> <li>• to archive data after the contract has been performed (pursuant to <b>Article 6(1)(c) of the GDPR</b> in connection with the legal provisions and pursuant to <b>Article 6(1)(f) of the GDPR</b> for data stored in archives and backup copies – the legitimate interest is the exercise of claims or defence against such claims, and ensuring data integrity).</li> <li>• to provide after-sales service, in particular the handling and processing of complaints or other claims, the conduct of the debt collection process (<b>Article 6(1)(f) of the GDPR</b> – the legitimate interest is the exercise of and defence against claims),</li> <li>• to fulfil legal obligations arising from conducting a business, including those under tax or civil law, e.g. in the area of accounting and taxation (<b>Article 6 (1) (c)</b>).</li> </ul> <p>The provision of data is a contractual requirement and/or a condition for entering into the contract; it is voluntary but necessary for the conclusion and performance of the contract. Some processing activities within the performance of the contract are regulated by law, so their provision is necessary for the performance of the contract.</p>
<p><b>Other processing based on consent</b></p>	<p>for the purposes each time specified in the text of the consent (<b>Article 6(1)(a) or Article 9(2)(a) of the GDPR</b>). The provision of data is voluntary, but necessary for the purposes specified in the text of the consent. Consent can be withdrawn at any time in the manner specified by the Controller when obtaining consent. The withdrawal of consent does not affect the lawfulness of the processing carried out before its withdrawal.</p>
<p><b>Provision of the website</b></p>	<ul style="list-style-type: none"> <li>• to study the user's preferences and behaviour on the Website by means of cookie technology, to compile statistics about the Website's users and use them to adapt/improve the service (<b>Article 6(1)(a) of the GDPR</b>).</li> <li>• for the technical delivery of content, maintenance and technical support of the service, ensuring the service's security, fraud prevention and debugging, and tailoring the</li> </ul>

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	<p>service to the users' needs (<b>Article 6(1)(f) of the GDPR</b>).</p> <p>The provision of data is voluntary but necessary for the above-mentioned purposes. For details on our website's data processing rules, including our cookie policy, please refer to our <a href="#">Privacy Policy</a>.</p>
<b>Newsletter</b>	<ul style="list-style-type: none"> <li>to send a newsletter with marketing content to your email address, based on your consent (<b>Article 6(1)(a) of the GDPR</b>).</li> </ul>
<b>Recruitments</b>	<ul style="list-style-type: none"> <li>to carry out the current recruitment process (pursuant to Article 6(1)(c) of the GDPR, including in connection with the provisions of Art. 22 (1) sec. 1 and Art. 229 of the Labour Code and implementing acts, and pursuant to Article 6(1)(a) of the GDPR and Article 9(2)(a) of the GDPR for data not provided for by the aforementioned provisions) and, on the basis of your consent, also in subsequent employee recruitments,</li> <li>to provide information about the progress of the ongoing recruitment process – based on your consent (Article 6(1)(a) of the GDPR).</li> </ul> <p>The provision of data is voluntary but, to the extent stipulated by the regulations, necessary in order to participate in recruitments.</p>
<b>Other processing based on the legitimate interests of the Controller</b>	<p>Your personal data are or may also be processed on the basis of <b>Article 6(1)(f) of the GDPR</b> if the processing is necessary for the following purposes arising from the legitimate interests pursued by the Controller:</p> <ul style="list-style-type: none"> <li>- internal administration and organisation of work, including carrying out internal supervision and reporting (the legitimate interest is to ensure the optimal functioning of the company),</li> <li>- ensuring the security of IT networks and processes (the legitimate interest is to protect persons and property).</li> </ul>

**What rights do you have in relation to your data that we process?**

You have the right to request the following from the Controller: access to your personal data and to receive a copy of your personal data; rectification (correction) of your personal data; erasure of your personal data if the processing does not take place in order to comply with a legal obligation; restriction of the processing of your personal data; portability of your personal data; lodging a complaint with the President of the Personal Data Protection Office (contact details on the Office's website at [www.uodo.gov.pl](http://www.uodo.gov.pl)) in case you consider that the processing of your personal data violates the provisions of the GDPR.

You also have the right to object at any time to the processing of your personal data based on Article 6(1)(f) of the GDPR. If you raise an objection to the processing of your personal data for a purpose arising from the legitimate interests pursued by the Controller, your personal data will not be processed by us for that purpose.

The reason for this objection must be your particular situation, so please indicate this particular situation when making your request. Once we have received your objection, we will stop processing your data for the purpose or purposes to which you have objected, unless we can demonstrate the existence of compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if we can demonstrate grounds for establishing, exercising or defending against claims.

In order to exercise the above-mentioned rights, please contact the Controller or the designated Data Protection Officer. The contact details are indicated [above](#).

**Who may be the recipient of your personal data?**

We only share your personal data with entities through which we can guarantee a high quality of service. These are primarily: accounting and office software providers (including Microsoft), maintenance or IT service providers, hosting company, website plug-in providers, courier and/or postal companies, accounting office, bank, marketing service providers. If you give the appropriate consent, these will also include: Google Ireland Ltd. We do not share your data with any third parties for their own use – only for the tasks specified above. All partners who process your personal data ensure data security and comply with all data protection obligations. We also share your personal data with authorised employees of the Company who perform tasks related to the processing of your data on behalf of the Controller.

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### **What are the rules for transferring your personal data outside the EEA?**

Your personal data is transferred to recipients in third countries, i.e. outside the European Economic Area (EEA) or to international organisations. We can transfer your personal data to a third country (outside the EEA) only if it guarantees at least the same level of data protection as is applicable in Poland. If you have given the appropriate consent, your personal data may or will be shared with Google Ireland Limited (Services). In accordance with the supranational nature of the flow of data within these Services, your data is transferred outside the EEA, including to countries for which the European Commission has not determined an adequate level of protection. Data protection is primarily ensured by the use of Standard Contractual Clauses together with appropriate safeguards (including data encryption). However, there is a risk of losing control over your data due to the legislation in force in these countries not providing enforceable data subject rights and effective legal remedies and the failure to provide appropriate safeguards as set out in Article 46 of the GDPR.

Your personal data is processed in this way for marketing purposes (we use marketing tools and cookies on our website) and to maintain customer communication. The data is only transferred based on your express consent.

### **How long do we store your personal data?**

How long do we store your personal data? We only store your personal data for the time necessary to achieve the purposes for which the data was collected (e.g. duration/performance of the contract) or for the period specified by law. In relation to data processed on the basis of consent – until the consent is withdrawn. In the case of processing for the purpose of answering a question – for 1 year from the end of the correspondence. In other cases, it will be the period of limitation of claims or other periods provided for by law.

### **How can we make decisions based on your personal data?**

We do not make automated decisions based on your personal data, nor do we perform automated profiling on it.

### **Video surveillance**

On the Company's premises, your image may be recorded and captured. The use of video surveillance is indicated by prominent signs containing the GDPR information clause and signs with the camera pictogram in the image collection areas. The processing of data by means of video surveillance takes place for the purpose of ensuring security and order and the possibility of reproducing the image for evidential, informative and preventive purposes in order to document undesirable events or unauthorised behaviour within the Company's public spaces, pursuant to Article 6(1)(f) of the GDPR and in accordance with Article 22(2) of the Labour Code Act. Your personal data may be transferred to entities providing services to the Controller in the field of personal and property protection and to entities entitled to receive them on the basis of applicable law. We store recorded and captured data for no longer than 6 months. The period of processing may be extended each time by the period of limitation of claims, if the processing of your personal data is necessary for the Controller to establish or exercise possible claims or to defend against such claims.