

PRIVACY POLICY HATOMI Sp. z o.o.

Ladies and Gentlemen!

This Privacy Policy provides you with information about how we process your personal data . We are making this Policy available to you so that every person with whom we enter into a relationship knows who is the controller of their personal data, on what basis and for what purposes we process the data and with whom we share it.

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§ 1

Administrator

1. The administrator of your personal data is HATOMI Sp. z o.o. with its registered office in Warsaw (44 Domaniewska St., 02-672 Warsaw)
2. The administrator can be contacted: at the address of our registered office or directly by email - email address: biuro@hatomi.pl.

§ 2

Data processing - different categories of persons

1. Employees and persons employed under a civil contract or other form.

If you are one of our employees or persons employed under a civil contract or other form of contract, then:

- 1) We process your data for the purpose of entering into or fulfilling a contract (Art. 6(1)(b) RODO), on the basis and to the extent set out in Article 22¹ of the Labour Code (Art. 6(1)(b) RODO), or for the purpose of fulfilling a civil contract (Art. 6(1)(b) RODO) and for the purpose of complying with other legal provisions incumbent on the Controller (Art. 6(1)(c) RODO), cases of processing on other grounds are described in §3;

- 2) Recipients of the data may be entities providing us with courier, postal, legal, accounting or IT services, our other trusted partners, banks and public authorities authorised by law;
- 3) Your data will be stored for the duration of the contract and min. 5 years from the end of the calendar year in which the deadline for the payment of tax in connection with the contract has expired, however, the law may provide for a longer retention period, in particular for the assertion or defence of claims; cases of longer data processing periods are described in § 3;
- 4) In relation to the processing, you have the right to access and rectify your data, the right to restrict processing, the right to object to processing, the right to lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw); please refer to § 4 for details of your individual rights;
- 5) Your personal data will not be processed through analytical profiling;
- 6) The provision of data is a contractual requirement and the refusal to do so may prevent the conclusion or execution of the contract.

2. Suppliers and contractors.

If you provide goods or services to us, then:

- 1) We process your data for the purpose of entering into or performing a contract (Art. 6(1)(b) RODO) and to comply with legal obligations incumbent on the Administrator (Art. 6(1)(c) RODO);
- 2) Recipients of the data may be our courier, postal, legal, accounting or IT service providers, our other trusted partners and public authorities authorised by law;
- 3) Data will be stored for a period of min. 5 years from the end of the calendar year in which the deadline for payment of the tax in connection with the concluded agreement expired, however, the law may provide for a longer data storage period, in particular for the assertion or defence of claims; cases of longer data processing periods are described in § 3;
- 4) In relation to the processing, you have the right to access and rectify your data, the right to restrict processing, the right to object to processing, the right to lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw); please refer to § 4 for details of your individual rights;
- 5) Your personal data will not be processed through analytical profiling;
- 6) The provision of data is a contractual requirement and the refusal to do so may prevent the conclusion or execution of the contract ;

3. Representative and contact persons.

If you are a representative or contact person, then:

- 1) We process your data on the basis of Article 6(1)(c) of the RODO, i.e. in order to fulfil legal obligations incumbent on the controller, as communication between us and you is sometimes necessary for these purposes;
- 2) The categories of personal data processed may include: your name, the company with which you are associated, your position/role, your business telephone number, your business email address, the history of contacts between us and you;
- 3) Recipients of the data may be our service providers, courier, postal, legal or IT companies, our other trusted partners and public authorities authorised by law;
- 4) The data will be kept for the period necessary to fulfil the needs of maintaining contact between us and you;
- 5) In relation to the processing, you have the right to access and rectify your data, the right to restrict processing, the right to object to processing, the right to lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw); please refer to § 4 for details of your individual rights;
- 6) Your personal data will not be processed through analytical profiling;

- 7) The provision of data is voluntary and the refusal to do so may prevent communication between us and you.

4. Those who use the services of our website.

If you contact us via our website, then:

- 1) We process your data via our website because it is necessary for the performance of a task carried out in the public interest (Article 6(1)(e) of the DPA);
- 2) The categories of personal data processed may include your IP address and other data you provide to us yourself;
- 3) Recipients of the data may be our IT service providers and our other trusted partners, as well as public authorities authorised by law;
- 4) Data will be kept for the period required by law, which depends on the type of data we process.
- 5) In relation to processing, you have the right to access and rectify your data, the right to restrict processing, the right to object to processing, the right to withdraw consent at any time (without affecting the lawfulness of processing carried out before withdrawal), the right to erasure, the right to lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw), details of your rights can be found in § 4;
- 6) We may also process information that enables us to remember your preferences in the use of the website - we use "cookies" to collect this type of data (see our Cookies Policy for more information);
- 7) Your personal data will not be processed through analytical profiling, binding decisions are not automated, i.e. they are never taken without human involvement;
- 8) The provision of data is voluntary, but may at times be necessary, for the proper provision of services by the Administrator.

5. Job applicants.

If you are interested in our job or cooperation offers, then:

- 1) We process your data in order to conclude an employment contract on the basis of and to the extent set out in Article 22(1) § 1 of the Labour Code (Article 6(1)(b) RODO), or to conclude a civil contract (Article 6(1)(b) RODO);
- 2) If you wish to participate in subsequent recruitments or include information in your application documents that may be considered sensitive data, this will be processed on the basis of your freely given consent (Article 6(1)(a) or Article 9(2)(a) RODO);
- 3) Data recipients may be IT service providers;
- 4) Data will be stored for the duration of the recruitment in question, unless you consent to further storage for future recruitment; cases of longer processing periods are described in § 3;
- 5) In relation to processing, you have the right to access and rectify your data, the right to restrict processing, the right to withdraw your consent at any time (without affecting the lawfulness of processing carried out prior to withdrawal), the right to object to processing, the right to erasure, the right to lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw), details of your rights can be found in § 4;
- 6) Your personal data will not be processed through analytical profiling;
- 7) The provision of data results from the scope defined by the Labour Code or is a contractual requirement (in the case of employment based on a civil law contract), and the refusal to provide such data may prevent the establishment of an employment relationship or the conclusion of a contract.

§ 3

Other grounds for processing

1. For the purposes necessary to comply with our legal obligations (Article 6(1)(c) RODO), we will process your data:
 - 1) for as long as we comply with legal obligations imposed on us by other relevant legislation, including but not limited to tax law, social security law, etc.
 - 2) for the period of time for which we are required by certain laws to keep the data (these laws may provide for different retention periods).
 - 3) We may also process your personal data on the basis of Article 6(1)(f) RODO, e.g. for the assertion of civil law claims.

§ 4

Of the Law

1. Right to access and obtain a copy of your personal data - upon your request, we will provide you with information on whether we process your personal data. We are also obliged, upon separate request, to provide you with more detailed information regarding: the purposes of the processing, the categories of personal data, the recipients of the data or their categories, the storage period of the personal data or the criteria for determining it, the source of the data acquisition, about the automated processing of the personal data and the consequences of such processing for you. If personal data is transferred to a third country, we will also inform you about the safeguards applied for the transfer upon your request. Upon your request, we will also make a copy of your personal data. This will be made available to you in a common IT file format. The first copy will be provided free of charge.
2. Right to rectification of data - if we find that your personal data is incorrect we will delete the inaccuracies. We will do this on our own initiative - or, if you bring it to our attention, at your request.
3. Right to erasure, including the "right to be forgotten" - if you do not wish your personal data to be processed and we determine that there are no other legal grounds that allow us to process your data - we will erase it from our databases. However, please note that the deletion of some data may prevent us from providing services to you - this applies to those services in connection with which it is necessary to process the personal data you have provided. For example, we will not be able to answer your questions and provide you with our offer if you request the deletion of your e-mail address. Despite such a request, we will, however, be able to process certain personal data under the terms of the RODO due to, for example, legal obligations incumbent on us.
4. Right to restrict processing - in the cases provided for by the RODO, we will restrict the processing of your personal data at your request. In the simplest terms, a restriction of processing prevents you from using your personal data beyond storage. In this case, any other actions on the data subject to the processing restriction will only be allowed with your consent. It should be noted, however, that this is not an absolute right and in certain cases we will nevertheless be able to process certain personal data under the terms of the RODO due to, for example, legal obligations incumbent on us.
5. Right to data portability - under the terms of the RODO, you may request the transfer of your personal data stored in a standard machine-readable file format. If your aim is to transfer them to another controller, we will send the file containing your personal data directly to them.
6. Right to object - in some cases, even if we process your personal data lawfully, without your consent, you may request us to stop processing your personal data by lodging an objection. This will be justified if you demonstrate that our lawful activities nevertheless harm your interests, rights or freedoms.
7. Right not to be subject to automated decisions in individual cases, including profiling - you have the right not to be subject to decisions that would be based solely on automated processing, including profiling, if they were to produce legal effects on you or similarly significantly affect you.
8. Right to withdraw consent at any time - where we have asked you for your consent you may withdraw that consent at any time. If we do not have a separate basis for processing, we will stop using your

personal data for the purpose for which consent was given. However, please note that withdrawing your consent may sometimes prevent us from providing you with interesting content or information.

9. The right to lodge a complaint with a supervisory authority - if you believe that your rights have been violated by our processing of your personal data, you may lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw).
10. The rights listed above may be limited in certain situations, as noted above, such as when we can demonstrate that we are legally obliged to process your data.
11. If you wish to exercise your due rights, all you need to do is to send an appropriate request using the contact details indicated in § 1.

§ 5

Data sources

1. As a general rule, most of the data we process is information that you have provided to us of your own free will.
2. In some cases, we may process personal data that we are able to infer against you on the basis of other information that you provide to us and that we obtain in the course of our relationship. This data will not be processed for longer than is necessary for the purpose for which it was collected or will be deleted immediately.
3. Where we have not obtained personal data directly from you, we would like to inform you that the data may have been obtained from a person or entity who has indicated you as a representative or designated contact.

§ 6

International data transfer

We do not transfer your personal data to countries and organisations outside the European Economic Area where the law may not provide an adequate level of protection for personal data.

§ 7

Concluding remarks

1. We reserve the right to make changes to this privacy policy, which may result, for example, from the need to adapt to changes in legislation
2. We will inform you of any changes to data processing by means of an appropriate communication on our website.
3. This Privacy Policy is effective as of 01.05.2023.