

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA OF USERS OF THE E-COMMERCE SALES PLATFORM**

Pursuant to Article 13 section 1 and 2 of the Regulation of the European Parliament and the Council (EU) 2016/679 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, and repealing Directive 95/46/EC (general data protection regulation - Official Journal of the European Union UE L 119 - hereinafter: the GDPR). we hereby inform the Buyer, or persons representing the Buyer whose data the Seller processes, that:

- 1) Podanfol S.A. - official seat: Podanin 71, 64-800 Chodzież, entered in the register of entrepreneurs of the National Court Register under number 0000320019, no. 570161109, NIP [tax id no.]: 7641009978, is the Controller of the Data obtained as a result of execution of contracts and agreements, documenting business operations, handling of correspondence, maintenance and operation of user accounts for the electronic e-Commerce sales platform and substantive handling of requests, complaints, claims and demands sent to us.
- 2) Podanfol S.A. processes the Buyer's personal data for the following purposes and on the following legal bases:
  - for purposes arising from the provisions of the contracts concluded (legal basis: Article 6(1)(b) of the GDPR);
  - in order to enable customers and contractors to use the electronic e-Commerce sales platform available on the website <https://www.podanfol.com/en> (legal basis: article 6(1)(a), (b), (e), (f) of the GDPR and the relevant provisions relating to electronic communications);
  - for purposes arising from Regulation (EC) No. 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, the Act of 25 August 2006 on food and nutrition safety, the Accounting Act and tax law, as well as in order to fulfil other obligations arising from legal provisions (legal basis: Article 6(1)(c, e) of the GDPR);
  - for analytical purposes as well as client and contractor satisfaction surveys to ensure that our services and optimisation of client and contractor service processes are performed in an appropriate way, which constitutes the Data Controller's legitimate interest (legal basis: Article 6(1)(f) of the GDPR);
  - in order to update and correct personal data of clients and contractors as well as to contact them in the event of problems with the implementation of their requests, complaints, claims and demands, which constitutes the Data Controller's legitimate interest (legal basis: Article 6(1)(f) of the GDPR);
  - for evidential purposes in pursuance of the Data Controller's legitimate interests consisting in safeguarding information in the event of a legal need to prove facts (legal basis: Article 6(1)(f) of the GDPR);
  - for the purpose of potential establishing, pursuing or defending against claims which is the exercise of the Data Controller's legitimate interest (legal basis: Article 6(1)(f) of the GDPR);
- 3) Personal data of users of the e-Commerce electronic sales platform are not subject to automated decision-making, including profiling, by Podanfol S.A.
- 4) Users of the e-Commerce electronic sales platform have the right to:
  - access their data and receive a copy thereof,
  - rectify (amend) their data,
  - erase their data (in accordance with the conditions set out in Article 17 of the GDPR),
  - restrict data processing (subject to the conditions set out in Article 18 of the GDPR),
  - transfer their data (in accordance with the conditions set out in Article 20 of the GDPR),
  - object to the processing of their data (in accordance with the conditions set out in Article 21 of the GDPR),
  - lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office, if the data subject considers that the processing of personal data by Podanfol violates the provisions of the GDPR.
- 5) The Data Controller will store the personal data of users of the electronic e-Commerce sales platform:
  - for the period necessary for the performance of the contract/service and the assertion or defence of claims, and after expiry of this period for the time necessary for: after-sales customer support (e.g. complaints handling), to secure or assert potential claims against the Administrator, as well as to fulfil the Administrator's legal obligations (e.g. under tax or accounting regulations);
  - in the case of data processing in order to pursue the legitimate interest of the Data Controller, for the period until the data subject raises an objection, subject to the necessity to process the data until the end of the period necessary to establish, assert or defend against claims;
  - in the case of processing based on a person's consent, if that person withdraws consent (in the absence of any other legal basis for processing) or objects thereto (we will cease processing for the purposes set out in the declaration of consent). Furthermore, we will keep evidence of the consent granted for 3 years for the purpose of

- proving the facts in the event of potential claims that we have incorrectly processed your personal data.
- 6) Personal data of e-Commerce platform users may be disclosed to public authorities and entities performing public tasks or acting on behalf of public authorities to the extent and for the purposes arising from generally applicable laws, banks, insurers, couriers, postal operators as well as entities and subcontractors connected with Podanfol S.A. under personal data processing agreements, e.g. law firms, companies providing the Company with IT services, including hosting services, personal and property security agencies, entity providing services of professional destruction of unnecessary documentation, entity performing the task of Data Protection Inspector.
  - 7) The Data Controller declares that it does not transfer and does not intend to transfer personal data to a third country or international organisation.
  - 8) In matters concerning data protection, you can contact us by telephone at +48 67 / 28 12 101 - 102. Electronic contact can be made by filling in the form available at <https://www.podanfol.com/pl/kontakt>.

The Management  
Board of PODANFOL  
S.A.