

## **Privacy Policy**

1. This Privacy Policy sets out the principles for the processing of personal data obtained through the <https://armorkw.pl> website (hereinafter referred to as the "Website").

2. The owner of the Web site and, at the same time, the Data Administrator is Armor KW spółka z ograniczoną odpowiedzialnością with its registered office in Małogoszcz (28-366) ul. Osiedle 17 lok. 6, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court in Kielce, X Economic Division of the National Court Register under KRS number 0000959574; NIP 6562345546, REGON 521446793. You can contact the indicated Administrator by mail, e-mail: [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl) or by phone: (+48) 781 323 264.

3. Personal data collected by the Administrator through the Website shall be processed in accordance with 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 and repealing Directive 95/46/EC (General Data Protection Regulation), also known as RODO.

4. The Administrator shall take special care to respect the privacy of Users visiting the Website.

5. The Administrator uses an SSL certificate issued by one of the world's leading companies in the field of security and encryption of data transmitted over the Internet.

### **§ 1 Type of data processed, purposes and legal basis**

1. The Administrator collects information concerning natural persons, including those conducting business or professional activity on their own behalf, and natural persons representing legal persons or organisational entities which are not legal persons and to which the Act grants legal capacity, hereinafter collectively referred to as Users.

2. Users' personal data are collected when using the contact form service on the Website in order to perform the contract provided electronically. Legal basis: necessity for the performance of the contract for the provision of the contact form service (Article 6(1)(b) RODO). Personal data will be processed in order to answer the question asked by the contact form through the communication channels you indicated in the form, on the basis of Article 6(1)(a) RODO.

3. When using the Contact Form service, the User shall provide the following data: name, email, telephone number, company and, if applicable, data contained in the body of the message.

4. When using the Website of the Service, additional information may be collected, in particular: the IP address assigned to the User's computer or the external IP address of the Internet provider, domain name, browser type, access time, type of operating system.

5. Navigation data may also be collected from Users, including information about links and references they choose to click on or other actions they take on the Website. Legal basis - the Administrator's legitimate interest (Article 6(1)(f) RODO) in facilitating the use of services provided electronically and in improving the functionality of these services.

6. For the purpose of establishing, investigating and enforcing claims, certain personal data provided by the User as part of the use of functionality on the Website may be processed if the claims arise from the way in which the User uses the services, other data necessary to prove the existence of the claim, including the extent of the damage suffered. Legal basis - legitimate interest (Article 6(1)(f) RODO).

RODO) to establish, assert and enforce claims and to defend against claims in proceedings before courts and other state authorities.

7. The Administrator processes the personal data of Users visiting the Administrator's profiles maintained on social media (Facebook, Instagram). This data is processed exclusively in connection with the running of the profile, including for the purpose of informing Users about the Administrator's activities and promoting various events, services and products. The legal basis for the Administrator's processing of personal data for this purpose is the Administrator's legitimate interest (Article 6(1)(f) RODO) in promoting its own brand.

8. The provision of personal data to the Administrator is voluntary, in connection with agreements concluded for the provision of services through the Website of the Service, with the proviso, however, that failure to provide the data specified in the forms will prevent the provision of the contact form service.

## **§ 2 To whom are data made available or entrusted and how long are they stored?**

1. The User's personal data are transferred to the service providers used by the Administrator in the operation of the Website. The service providers to whom personal data is transferred, depending on the contractual arrangements and circumstances, either are subject to the Administrator's instructions as to the purposes and means of processing such data (processors).

The Controller uses providers who process personal data only on the instructions of the Controller. These include, but are not limited to, suppliers providing hosting, IT and technical support services, systems for analysing traffic on the Website.

2. Location. The Service Providers are based in Poland and in other countries of the European Economic Area (EEA).

3. the Users' personal data shall be stored:

(a) Where the basis for the processing of personal data is consent under Article 172 of the Telecommunications Act, then the User's personal data shall be processed by the Administrator for as long as the consent is not revoked, and after revocation of the consent for a period of time corresponding to the period of limitation of claims that the Administrator may raise and that may be raised against him. Unless specifically provided otherwise, the limitation period is six years, and three years for claims for periodic benefits and claims related to the conduct of business.

b) Where the basis for data processing is the performance of a contract, then the User's personal data shall be processed by the Administrator for as long as is necessary for the performance of the contract, and thereafter for a period corresponding to the period of limitation of claims. Unless a specific provision provides otherwise, the period of limitation is six years, and for periodic performance claims and claims related to the conduct of business, three years.

4. Navigation data may be used in order to provide Users with better service, to analyse statistical data and to adapt the Website to Users' preferences, as well as to administer the Website.

5. In the event of a request being made, the Administrator shall make personal data available to authorised state bodies, in particular to organisational units of the Prosecutor's Office, the Police, the President of the Office for Personal Data Protection, the President of the Office for Competition and Consumer Protection or the President of the Office of Electronic Communications.

## **§ 3 IP address**

The Administrator may collect IP addresses of Users. An IP address is a number assigned to the computer of a person visiting the Website by the Internet Service Provider. The IP number enables access to the Internet. In most cases, it is assigned to the computer dynamically, i.e. it changes each time the computer connects to the Internet. The IP address is used by the Administrator to diagnose technical problems with the server, to create statistical analyses (e.g. determining from which regions we record the highest number of visits), as information useful in administering and improving the Website, as well as for security purposes and the possible identification of unwanted automatic programmes overloading the server for browsing the contents of the Website.

The Website contains links and references to other websites. The Administrator shall not be liable for the privacy protection rules applicable therein.

#### **§ 4 Rights of data subjects**

1. Right to withdraw consent - legal basis: Article 7(3) of the DPA.

a) The user has the right to withdraw any consent he/she has given to the Administrator.

b) Withdrawal of consent has effect from the moment of withdrawal.

c) Withdrawal of consent does not affect the processing lawfully carried out by the Administrator prior to its withdrawal.

d) Withdrawal of consent does not entail any negative consequences for the User, however, it may prevent further use of services or functionalities that the Administrator can lawfully provide only with consent.

2. Right to object to the processing of data - legal basis: article 21 RODO.

a) The User has the right to object at any time - for reasons related to his/her particular situation - to the processing of his/her personal data, including profiling, if the Administrator processes his/her data on the basis of a legitimate interest, e.g. marketing of the Administrator's products and services, keeping statistics on the use of particular functionalities of the Website and facilitating the use of the Website, as well as satisfaction surveys.

b) Opting out, in the form of an email, from receiving marketing communications concerning products or services will imply the User's objection to the processing of his/her personal data, including profiling for these purposes.

c) If the User's objection proves to be well-founded and the Administrator has no other legal basis for the processing of personal data, the User's personal data will be deleted, against the processing of which, the User has raised an objection.

3. Right to erasure ("right to be forgotten") - legal basis: article 17 RODO.

a) The User has the right to request the erasure of all or some of his/her personal data.

b) You have the right to request the erasure of personal data if:

- the personal data are no longer necessary for the purposes for which they were collected or for which they were processed;

- he/she has withdrawn specific consent, to the extent that the personal data were processed on the basis of his/her consent;

- has objected to the use of his/her data for marketing purposes;

- the personal data is unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union law or the law of a Member State to which the Controller is subject;
- the personal data were collected in connection with the offering of information society services.

c) Despite a request for erasure of personal data, in connection with the lodging of an objection or withdrawal of consent, the Administrator may retain certain personal data to the extent that the processing is necessary for the establishment, assertion or defence of claims, as well as for the fulfilment of a legal obligation requiring processing under Union law or the law of a Member State to which the Administrator is subject. This applies in particular to personal data including: first name, surname, e-mail address, which data are retained for the purposes of investigating complaints and claims relating to the use of the Administrator's services, or, in addition, residence address/correspondence address, order number, which data are retained for the purposes of investigating skaAdministrator and claims relating to concluded sales contracts or the provision of services.

#### 4. The right to restrict data processing - legal basis: article 18 RODO.

a) The user has the right to request the restriction of the processing of his/her personal data. The submission of a request, until it is considered, prevents the use of certain functionalities or services, the use of which will involve the processing of the data covered by the request. The Administrator will also not send any communications, including marketing communications.

(b) The User has the right to request the restriction of the use of personal data in the following cases:

- when he or she questions the correctness of his or her personal data, in which case the Administrator restricts the use of the data for the time needed to verify the correctness of the data, but no longer than for 7 days;

- when the processing of the data is unlawful, and instead of deleting the data the User requests the restriction of its use;

- when the personal data are no longer necessary for the purposes for which they were collected or used, but the User needs them in order to establish, assert or defend his/her claims;

- when he/she has objected to the use of his/her data, in which case the restriction shall take place for the time necessary to consider whether, due to the particular situation, the protection of the User's interests, rights and freedoms outweighs the interests pursued by the Administrator in processing the User's personal data.

#### 5. right of access - legal basis: article 15 of the RODO.

(a) You have the right to obtain confirmation from the Administrator as to whether it is processing your personal data and, if so, you have the right to:

- gain access to his/her personal data;

- obtain information about the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients of such data, the intended period of retention of the User's data or the criteria for determining that period (where it is not possible to determine the intended period of processing), the User's rights under the RODO and the right to bring skaAdministratori to the supervisory oAdministratori, the source of such data, automated decision-making, including profiling, and the safeguards applied in connection with the transfer of such data outside the European Union;

- obtain a copy of your personal data.

6. right to rectification of data - legal basis: article 16 of the RODO.

a) The User has the right to request from the Administrator the immediate rectification of personal data concerning him/her that is inaccurate. Taking into account the purposes of the processing, the Data Subject has the right to request the completion of incomplete personal data, including by providing an additional statement, by addressing the request to the email address.

7. Right to data portability - legal basis: article 20 RODO.

a) The User has the right to receive his/her personal data that he/she has provided to the Administrator and then send it to another Personal Data Controller of his/her choice. The User also has the right to request that the personal data be sent by the Administrator directly to such Administrator, insofar as this is technically possible. In such a case, the Administrator will send the User's personal data in the form of a file in csv format, which is a commonly used, machine-readable format that allows sending the received data to another Personal Data Administrator.

8. In the event of the User's assertion of an entitlement under the above rights, the Administrator shall either comply with the request or refuse to comply with the request immediately, but no later than within one month of receipt. However, if - due to the complicated nature of the request or the number of requests - the Administrator will not be able to comply with the request within one month, he will comply with it within the next two months informing the User earlier, within one month of receiving the request, about the intended extension of the deadline and the reasons for it.

9. The User may lodge complaints, queries and requests to the Administrator regarding the processing of his/her personal data and the exercise of his/her rights.

10. The User has the right to request the Administrator to provide a copy of the standard contractual clauses by directing an enquiry as indicated in §6 of the Privacy Policy.

11. The User has the right to lodge a skąAdministratori with the President of the Office for Personal Data Protection regarding the violation of the User's data protection rights or other rights granted under the RODO.

## **§ 5 Changes to the Privacy Policy**

1. The Privacy Policy may be amended if necessary.

## **INFORMATION CLAUSE FOR CONTRACTORS**

In accordance with Article 13(1) and (2) of the General Data Protection Regulation of 27 April 2016 (RODO), we inform you that:

1. the Administrator of your personal data is Armor KW spółka z ograniczoną odpowiedzialnością with its registered office in Małogoszcz (28-366) ul. Osiedle 17 lok. 6 (hereinafter: "Administrator"). You can contact the Administrator by phone (tel. +48 781 323 264) and by e-mail (email: [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl)) or by post.

2. The Administrator may process the following personal data of Contractors, representatives or contact persons on the part of Contractors:

(a) in the case of Contractors who are natural persons: name and surname, company, e-mail address, correspondence addresses, telephone numbers, TIN, REGON, other numbers and data related to entries in public registers, other data provided to the Administrator by Contractors and representatives or contact persons on the Contractors' side;

b) in the case of representatives or contact persons on the part of the Contracting Parties: name and surname, business e-mail address, business telephone number, business correspondence address (address of the place of employment), personal data resulting from the content of powers of attorney, other data related to employment (e.g. business position), other data provided to the Administrator by the Contracting Parties and representatives or contact persons on the part of the Contracting Parties. The source of your personal data processed by the Administrator is the entity you represent or work for or with. 3.

3. The legal basis for the processing of your personal data is :

3.1. if you are a Contractor:

(a) the necessity for the conclusion and performance of the contract to which you are a party, or to take steps at your request prior to the conclusion of the contract and to ensure the correct quality of the services (Article 6(1)(b) RODO - performance of the contract);

b) the performance of legal obligations incumbent on our company, such as issuing and storing invoices or responding to complaints (Art.6(1)(c) RODO - legal obligation);

c) necessity for purposes arising from the legitimate interests of the Administrator, consisting, inter alia, of ensuring the continuous and uninterrupted operation of the business, internal administrative purposes (including service management), necessary settlements in connection with the concluded contract, establishing, asserting or defending claims and against claims (art.6(1)(f) RODO - legitimate interest pursued by the Administrator).

3.2 if you are a natural person representing a legal person or an organisational unit that is a party to the contract or taking steps prior to the conclusion of the contract, as well as an employee or co-worker of such legal person or unit, participating in the conclusion or performance of the contract - Article 6(1)(f) RODO, i.e. : necessity for the purposes arising from the legitimate interests pursued by the Administrator, consisting of activities related to the establishment of the terms and conditions for the conclusion of the contract with the Contracting Party and the facilitation of the communication related to its execution, as well as the establishment of the persons responsible for the execution and authorized contacts in the execution of the contract.

4. Your personal data will be processed for a period no longer than is necessary for the specific purposes for which they are processed. As a rule, personal data collected for the purpose of concluding and performing a contract shall be processed for the period necessary for the performance of the obligations arising from that contract, unless legal regulations, in particular accounting or tax regulations, oblige the Administrator to process personal data for a longer period and/or until the expiry of the limitation period for possible claims, which results from generally applicable laws - whichever of the aforementioned periods is longer. The aforementioned data processing periods may be subject to an appropriate, necessary extension, in the case of claims and proceedings, e.g. court proceedings - by the duration of these proceedings and their settlement. Furthermore, your personal data will be stored for the duration of the Administrator's cooperation with the entity you represent or under whose authority you act. After the termination of the cooperation with that entity, the Administrator will continue to store your personal data if the storage of the documentation containing the personal data proves necessary for the establishment, investigation or defence of claims arising from that agreement (until the lapse of these claims), or for the fulfilment of legal obligations incumbent on the Administrator, including in particular the obligation to keep documentation for tax

purposes. Your contact details in the form of your telephone number and email address will not be stored after the termination of your relationship with the entity you represent or under whose authority you act, and in the event that you cease to represent that entity or act under its authority in your dealings with the Administrator.

5. The processing of your personal data may involve entities providing support to the Administrator on the basis of outsourced services and in accordance with concluded data processing entrustment agreements, including entities providing IT services, e-mail services and accounting services.

6. Your personal data will not be transferred to a third country (outside the European Economic Area) or to an international organisation.

7. You have the right of access to the content of your data and the right to rectification, erasure, restriction of processing, the right to data portability, the right to object, the right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal, a declaration of withdrawal of consent to the processing of personal data requires its submission in writing or electronically to the email address [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl).

8. You have the right to lodge a complaint to the supervisory authority - the President of the Office for the Protection of Personal Data, if you consider that the processing of your personal data violates the law.

9. The processed personal data shall not be used for automated decision-making, including profiling.

10. Provision of personal data indicated in concluded contracts and agreements is voluntary, although necessary to undertake activities in contacts with the Administrator on behalf of or with the authority of the entity you represent. Failure to provide data will result in the impossibility to conclude an agreement with the Administrator.

### **MARKETING INFORMATION CLAUSE**

In accordance with Article 13(1) and (2) of the General Data Protection Regulation of 27 April 2016 (RODO), we inform you that:

1. the Administrator of your personal data is Armor KW spółka z ograniczoną odpowiedzialnością with its registered office in Małogoszcz (28-366) ul. Osiedle 17 lok. 6 (hereinafter: "Administrator"). You can contact the Administrator by phone (tel. +48 781 323 264) and by e-mail (email: [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl)) or by post.

2. Your personal data will be processed for marketing purposes, through the communication channels you have consented to, based on Article 6(1)(a) and (f) of the RODO.

3. your personal data will only be processed by authorised employees of the data controller.

4. your personal data will not be transferred to third countries or international organisations.

5. your personal data will be stored for the time necessary to fulfil the purpose for which they were obtained, or until your consent is withdrawn with regard to the communication channels for which your consent is withdrawn. After that, your data will be deleted.

6. You have the right of access to the content of your data and the right to rectification, erasure, restriction of processing, the right to data portability, the right to object, the right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of consent

before its withdrawal, the declaration of withdrawal of consent to the processing of personal data requires its submission in writing or electronically to the email address [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl).

7. You have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data violates the provisions of the RODO.

8. the provision of personal data by you is voluntary. Failure to provide your data will result in your personal data not being used for marketing purposes via a communication channel to which you have not consented.

9. your personal data will not be processed through profiling.

### **RECRUITMENT INFORMATION CLAUSE**

In accordance with Article 13(1) and (2) of the General Data Protection Regulation of 27 April 2016 (RODO), we inform you that:

1. the Administrator of your personal data is Armor KW spółka z ograniczoną odpowiedzialnością with its registered office in Małogoszcz (28-366) ul. Osiedle 17 lok. 6 (hereinafter: "Administrator"). You can contact the Administrator by phone (tel. no. +48 781 323 264) and by email (email: [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl)) or by post.

2. Your personal data will be processed by us in order to carry out the recruitment process (Article 6(1)(b) and (c) RODO). With your consent, your data will also be processed for future recruitments on the basis of Article 6(1)(a) of the DPA.

3. The recipients of your personal data will be persons employed in the HR department and persons who are substantively involved in the recruitment of employees for the given job position, as well as IT service providers with the help of which the Administrator collects and processes your personal data in its IT system.

4. Your personal data will be retained by us until the recruitment has been completed and, where you have consented to participate in future recruitments, for a period of 6 months from the date you provided us with your data or until you withdraw the consent you have given us.

5. You have the right of access to the content of your personal data and the right to rectification, erasure, restriction of processing, the right to data portability and the right to object to the processing of your data. If you have consented to the processing of your data for the purposes of future recruitment, you also have the right to withdraw this consent at any time without affecting the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal. A declaration of withdrawal of consent to the processing of personal data requires its submission in writing or electronically to the email address [armorkw@armorkw.pl](mailto:armorkw@armorkw.pl).

6. You have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data violates the provisions of the RODO.

7. your personal data will not be processed through profiling.

8. your personal data will not be transferred to third countries or international organisations.

9. Provision of personal data for the purposes of the current recruitment process to the extent specified in Article 221 § 1 of the Act of 26 June 1974. - Labour Code (Dz.U.2020.1320 t.j.) is a statutory requirement and is obligatory due to labour legislation, and in the remaining scope it is voluntary.