

DATA PROTECTION POLICY

I. PERSONAL DATA PROTECTION (GDPR)

In view of the data protection regulations and, in particular, Article 13 of 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 (GDPR), we would like to provide you with some necessary information:

1. Who is the Controller of your personal data?

The Controller of the personal data provided by you is ELSTAR ENGINEERING Spółka z o.o. with a registered office in Elbląg, Poland, at the following address: ul. M. Rosnowskiego 11, 82-300 Elbląg.

2. What are the categories of personal data concerned?

The personal data concerned is the data that is collected in connection with your use of our services. For this purpose we need the following data from you: first name, surname, business name, business address and VAT ID (NIP).

In addition, for contact purposes we need your e-mail address and/or telephone number.

3. What is the purpose of the personal data processing?

- a) In the event that an agreement (such as a sale, lease, mandate or service agreement, etc.) has been entered into, personal data will be processed for the purposes of performance of the provisions of the agreement,

- the legal basis for the processing of personal data in this case is Article 6(1)(b), namely processing is necessary for the performance of a contract, and Article 6(1)(f), namely a legitimate interest pursued by the Controller;

- b) The personal data may be processed for the purposes of distribution of commercial information, including marketing information, with regard to the company's own products and services, by electronic means and/or telephone,

- the legal basis for the processing of personal data for marketing purposes is Article 6(1)(a), namely the consent of the data subject, and Article 6(1)(f), namely a legitimate interest pursued by the Controller;

- c) Personal data may be processed for the purposes of pursuing claims arising in connection with the business activity conducted by Elstar Engineering Spółka z o.o.,

- the legal basis for the processing of personal data in this case is Article 6(1)(b), namely processing is necessary for the performance of a contract, and Article 6(1)(f), namely the legitimate interest pursued by the Controller;

- d) Personal data may be processed for the purposes of performance of legal and tax obligations arising in connection with the business activity conducted by Elstar Engineering Sp. z o.o.,

- the legal basis for the processing of personal data in this case is Article 6(1)(b), namely processing is necessary for the performance of a contract, and Article 6(1)(f), namely the legitimate interest pursued by the Controller;

4. Is the personal data/will the personal data also be processed in any other manner?

As a business entity conducting a commercial and service-providing activity we make every effort to protect the confidentiality of your data. Given the need to ensure proper organisation of our company, for example as regards the IT infrastructure or day-to-day matters related to our activities as an enterprise, your data may be transferred, i.e. disclosed or made available, to the following categories of recipients:

- a) other business entities cooperating with Elstar Engineering Sp. z o.o. in a provision of services;
- b) service providers supplying Elstar Engineering Sp. z o.o. with technical, IT and organisational solutions enabling provision of services by Elstar Engineering Sp. z o.o. and management of our company (in particular providers of ICT services, courier companies and postal operators), and
- c) providers of legal and advisory services supporting Elstar Engineering Sp. z o.o. in pursuing its claims (such as law firms and debt collection agencies);

- the legal basis for the processing of personal data in this case is Article 6(1)(b), namely processing is necessary for the performance of a contract, and Article 6(1)(f), namely the legitimate interest pursued by the Controller.

Please be advised that the entities which process personal data on behalf of Elstar Engineering Sp. z o.o. operate pursuant to and in compliance with data processing agreements (in accordance with Article 28 of GDPR) or on the basis of a confidentiality statement submitted.

5. Where do we have your data from?

We received your personal data from you in the course of or in order to establish cooperation, or derived it from websites and commercial databases available on the market.

6. How long is personal data processed?

Please be informed that the personal data will be processed for such a period as is necessary for the purposes specified in Section 3 above:

- a) as regards performance of the provisions of the agreement: we store your personal data throughout the term of the agreement and thereafter for the following purposes:
 - to pursue claims, if any, in connection with performance of the agreement,
 - to perform the obligations arising from the laws, including in particular tax and accounting obligations,
 - for statistical or archiving purposes,
 - however, no longer than for a period of 10 years from the date of completion of performance of the agreement or until the lapse of the claims limitation period;
- b) for marketing purposes: we store your personal data throughout the term of the agreement or until the earlier of: your withdrawal of consent or your objection to such processing;
- c) for the purposes of subscription to the newsletter: we store your personal data until the earlier of: your withdrawal of consent or your objection to such processing.

After the lapse of the periods referred to above your data will be deleted or anonymised.

7. Is provision of personal data obligatory?

Please be informed that provision of personal data is not obligatory. However, considering pursuance of the purposes referred to in Section 3, personal data can be provided:

- a) as a contractual requirement, namely provision of personal data is a condition that has to be satisfied in order to enter into an agreement. In other words, if you refuse to provide your personal data, you will not be able to enter into an agreement and hence use the services and products offered by HAKO POLSKA Sp. z o.o., or
- b) on a voluntary basis, however provision of personal data is necessary for the purposes relating, among other things, to:

- your receipt of commercial information, including marketing information, on the products and services of HAKO POLSKA Sp. z o.o. by electronic means and/or telephone.

8. What are your rights?

In connection with your personal data being processed by Elstar Engineering Sp. z o.o. you have the right to access your personal data, have it rectified or deleted, to restrict the processing of your personal data and to transfer it, as well as the right to object to the processing of your personal data.

Please be further advised that where personal data is processed based on consent, any consents to the processing, referred to in Section 3, may be withdrawn at any time. The withdrawal of consent does not, however, affect the lawfulness of processing based on consent before the withdrawal.

You have also the right to lodge a complaint with a supervisory authority.

9. Who can you contact for issues related to personal data processing?

If you have any queries or doubts, please contact us at: rodo@elstar-engineering.com

II. COOKIE POLICY

This Policy relates to “cookie” files and applies to websites operated by Elstar Engineering Sp. z o.o. with a registered office in Elbląg, Poland (hereinafter referred to as the “websites”).

WHAT ARE COOKIES?

Cookies are small files that are saved on the user’s computer, tablet or smartphone when you visit various websites on the Internet.

WHAT DO COOKIES CONTAIN AND WHAT ARE COOKIES USED FOR?

Cookies contain the title of the website they originate from, their lifetime in the user’s device and a unique ID tag generated. This enables identification of the device and the type of the browser used by the user. This is in order to display the web page adjusted to the user’s individual needs and optimise web browsing.

Cookies are also used to generate anonymous statistics that assist in understanding of how users browse the websites, thanks to which the website content and structure can be improved.

WHAT TYPES OF COOKIES DO WE USE?

In our elstar-engineering.com service we use three types of cookies.

“Functional” cookies which record the user’s settings preferences and customise the user’s interface. For example, they record the region the user accesses our website from or the language used by the user.

“Essential” cookies which enable the user to use all the functionalities offered by the service, e.g. authenticating cookies.

Cookies that save the user’s session.

Cookies falling within the categories listed above are further categorised as:

Session cookies – cookies of this type are stored in the user’s device until the browser is closed. After the browser session is finished, these cookies are permanently deleted from the device memory.

Persistent cookies – cookies of this type are stored in the device until they are deleted by the user.

Neither session cookies, nor persistent cookies allow any personal data or any confidential information to be retrieved from the user’s device.

If you use a mobile device (a mobile telephone, a smartphone, a tablet), get acquainted with the privacy protection options in the documentation available on the website of the manufacturer of your device.

Disabling cookies can impede the use of certain functionalities offered by our service. However, disabling the cookie acceptance option does not block access to the content of our service.