

PRIVACY POLICY OF CENTRUM ELEKTRYCZNE "ANIA" BOGUCCY SP. Z O.O. SP. K.

The Privacy Policy defines rules of collecting, processing and using personal data obtained by Centrum Elektryczne "ANIA" Boguccy sp. z o.o. sp. k.

The Controller of your personal data in relation to their processing for the purposes indicated below is:

Centrum Elektryczne "ANIA" Boguccy sp. z o.o. sp. k., KRS: 0000473142 DISTRICT COURT FOR ŁÓDŹ-ŚRÓDMIEŚCIE IN ŁÓDŹ, 10th DIVISION OF THE NATIONAL COURT REGISTER, NIP (Tax ID No.): 832 000 41 79, REGON (Business ID No.): 730015440 with its registered office at: ul. R. Traugutta 43, 98-300 Wieluń.

Centrum Elektryczne "ANIA" Boguccy sp. z o.o. sp. k. shall exercise due diligence, so that personal data are processed in accordance with the purposes, for which they were collected and used in accordance with the scope of granted permissions (consents) and in areas of processing permitted by law.

Your personal data are processed by the Data Controller in accordance with the applicable legal provisions, and in particular in compliance 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).

You can contact us for all matters relating to your personal data via the Data Protection Officer, who can be contacted by e-mail at a.bednarek@centrumelektryczne.pl or by post at: Centrum Elektryczne "ANIA" Boguccy Sp. z o.o. Sp. k., ul. R. Traugutta 43, 98-300 Wieluń, Poland, with a note "Data Protection Officer".

WHERE DO WE GET YOUR DATA FROM

We obtain your data directly from you, e.g. in the course of concluding and performing contracts or answering your questions (e.g. via the contact form on our website). We may also obtain data from publicly available sources, such as your company's website or the website of the company you work for. These data include your name, surname, position, company phone number and e-mail address (for contact purposes), or from the National Court Register or the Central Register and Information on Economic Activity (in order to verify the information

provided by you, only to the extent indicated therein), as well as from publicly available industry portals. Your data may also be provided by your employer – in order to enable us to contact them within the framework of the contract concluded with them or to verify your identity (e.g. when you are a driver who comes to collect our product). We may also obtain your data from the “white list of VAT taxpayers” kept in accordance with Article 96(b) of the Act of 11 March 2004 on tax on goods and services, to the extent indicated therein.

FOR WHAT PURPOSE DO WE PROCESS YOUR DATA

Your personal data are processed for the following purposes:

1. **to conclude and perform a contract** (Article 6(1)(b) GDPR) – including to verify payment reliability and settle the contract – on the basis of data provided by you or data from other sources (National Court Register, Central Register and Information on Economic Activity, Economic Information Offices), in each case the basis for obtaining information are regulations governing the functioning of individual databases;
2. **to comply with our legal obligations** (Article 6(1)(c) GDPR) consisting, in particular, in:
 - a. fulfilling tax obligations (issuing and settling invoices and other accounting documents);
 - b. verification of the contractor’s data included in the so-called “white list of VAT taxpayers” kept in accordance with Article 96(b) of the Act of 11 March 2004 on tax on goods and services, in the scope specified therein, i.e. verification whether the contractor is an active VAT taxpayer, verification of the reasons, for which the contractor was refused registration, deleted from the register or reinstated as a VAT taxpayer and learning the legal basis for these decisions, as well as confirmation of the contractor’s bank account number;
 - c. compliance with obligations relating to the exercise of rights set out in the GDPR (including to the extent necessary to identify and verify the identity of the person making a request and to respond);
3. **to pursue our legitimate interests** (Article 6(1)(f) GDPR), in the form of:
 - a. direct marketing of our products or services carried out during the performance of the contract, provided that, in the case of e-mail marketing, additional consent will be given for the source of the marketing message;
 - b. establishing, asserting or defending against claims that may arise in connection with the conclusion of contracts (performance and settlement of the contract, processing of claims) or in connection with the performance of obligations under the provisions of the GDPR (to be able to demonstrate compliance);
 - c. responding to inquiries and offers submitted via the contact form or at the employee’s e-mail address (e-mail correspondence);
 - d. enabling contact between employees of the contracting parties, who are not party to the concluded contracts, both at the bidding stage and within the scope of execution of the concluded contracts;
 - e. verifying identity of employees of contractors cooperating with Centrum Elektryczne ANIA Boguccy sp. z o.o. sp. k., e.g. drivers collecting products purchased from us;

f. organizing trainings and marketing events for employees or associates of contractors or potential contractors.

4. **to receive our commercial (marketing) information** – on the basis of the consent granted for this purpose (Article 6(1)(a) GDPR).

Providing the data is voluntary, but it is necessary for the above purposes, e.g. so that we can conclude a contract with you or answer your question. Your consent is always completely voluntary – in particular, when we obtain your consent to send you commercial information under the contact form, giving your consent is not a condition for sending a question and receiving an answer. Provision of data resulting from legal regulations is obligatory. Failure to provide such information may result in legal consequences, e.g. tax consequences.

We may also process your data for other purposes – subject to compliance with all legal requirements to do so (in particular, where we have the necessary legal basis and comply with information obligations towards you).

TO WHAT EXTENT DO WE PROCESS YOUR DATA

The scope of personal data processed has been limited to the minimum extent necessary to provide the services. The provision of additional data that are not necessary for the provision of the service is voluntary and your express consent is required for their further processing. In order to execute a contract, we collect the following data:

- first and last name
- delivery address
- electronic mail address (e-mail)
- phone number
- company name
- company data

HOW LONG DO WE PROCESS YOUR DATA

We will retain your personal information for the period necessary to fulfil the purposes set forth in this Policy, and thereafter for the period provided by law or necessary to pursue possible claims, or until you withdraw your consent.

WHO WE MAY SHARE DATA WITH

Your data will not be disclosed to anyone, unless it is necessary for the execution of a contract to which Centrum Elektryczne ANIA Boguccy sp. z o.o sp. k. is a party (e.g. contracts with insurance or shipping companies) or it results from the law, e.g. we are asked to do so by the Police or other authorized body (e.g. we can provide the contractor's data to the Tax Office in accordance with Article 117(b)(a) § 3 of the Tax Ordinance). We may also share your data when we have another legal basis, which is always verified by us and which we inform you about.

Your personal data may also be transferred to entities that process personal data on our behalf, such as accounting, IT, administrative and OHS service providers. We enter into data processing agreements with these entities and they may only process your data for the purpose and to the extent set out in such agreements.

Your personal data may be forwarded to employees of other departments (e.g. if you have concluded a contract with the sales department, your data will also be forwarded to logistics – in order to complete the delivery). Only authorized employees have access to personal data to the extent necessary to perform their duties in a given position.

If your personal data are to be transferred outside the EEA, we will put in place appropriate safeguards to ensure that such transfers are carried out in accordance with applicable data protection principles.

WHAT RIGHTS DO YOU HAVE IN TERMS OF PROCESSING OF YOUR PERSONAL DATA?

You have the right to access your personal data and correct them, request their completion, updating, rectification, temporary or permanent suspension of their processing or their deletion, if they are incomplete, outdated, untrue or have been obtained in violation of the Act, or are no longer required for the purpose, for which they were collected. Your rights also include the right to data portability and the right to withdraw consent to the processing of personal data, if the processing of personal data is based on a legal provision. You also have the right to object to the processing of your personal data for a specific purpose, such as marketing purpose.

You can exercise the above rights by contacting the Data Protection Officer at e-mail address a.bednarek@centrumelektryczne.pl or by post to the following address: Centrum Elektryczne "ANIA" Boguccy Sp. z o.o. Sp. k., ul. R. Traugutta 43, 98-300 Wieluń, Poland, with a note "Data Protection Officer".

In response to your request, you may be asked to provide data necessary to verify your identity or provide additional information needed to properly process your request.