

Personal Data processing at the PCC Group Company based in Czechowice-Dziedzice

I. Who is the controller in respect of your personal data?

The following information applies to the company PCC Consumer Products Czechowice S.A. which is part of PCC Group, having its registered office in Czechowice-Dziedzice (43-502) at ul. Łukasiewicza 5, Polska/Poland, entered in the register of entrepreneurs of the National Court Register by the Katowice-Wschód District Court in Katowice, the VIIIth Commercial Division of National Court Register under number 0000276919, identified by NIP tax ID 652-000-47-05, having a share capital of PLN 10.000.000,00, fully paid up.

The company PCC Consumer Products Czechowice SA, being part of PCC Group, is a separate Personal Data controller ("Personal Data"), i.e. it takes decisions on the purposes and means of the processing of Personal Data ("Controller"). However, it may happen that another company being part of PCC Group carries out certain activities for PCC Consumer Products Czechowice SA, e.g. provides bookkeeping and human resources services – in such a case a company providing such services is not a controller in respect of your Personal Data but processes them under the data processing agreement entered into with the Controller.

If you should have any queries concerning Personal Data, please send an email to the following address: odo.czechowice@pcc.eu

II. How do we process your Personal Data?

Personal Data are all and any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to mental, physical, physiological, genetic, economic, cultural or social identity of that person.

Data are processed in accordance with current applicable regulations, including the General Data Protection Regulation (GDPR).

The Controller declares that it takes the utmost care to safeguard the interests of data subjects and, in particular ensures that:

- a. It processes Personal Data in accordance with applicable law in a fair and transparent manner;
- b. It collects Personal Data for specific, explicit and legitimate purposes and does not further process them in a manner that is incompatible with those purposes;
- c. Personal Data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. Personal Data are accurate and, where necessary, kept up to date;
- e. It keeps Personal Data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f. It processes Personal Data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

When do we process your Personal Data?

We process Personal Data in our capacity as a Controller in numerous situations. These include situations where you have provided your Personal Data to us yourselves using various channels of communication (e.g. by submitting your application, sending a query / business proposal via email, by phone or while doing business with us i.e. when entering into a contract with us or performing such a contract (including distance contracts as part of the provision of services via electronic means), as well as situations where we have obtained your Personal Data for other sources (e.g. from a company which you do business with and which trades with us / is our customer, including other PCC Group companies).

IV. Data Processing in connection with commercial and business relationships as well as contact.

a. What Personal Data do we process?

As a Controller we process the Personal Data of our customers as well as business partners and their employees / contractors, other individuals' Personal Data provided to us in the course of the performance of contracts as well as the personal data of individuals contacting us by phone and via email.

In the context of such relationships we may process the following Personal Data: identification data, address particulars, data on one's position and professional credentials as well as other Personal Data provided to us in connection with maintaining a business relationship or getting in touch with us.

We obtain the afore-mentioned Personal Data directly from you and from other individuals, e.g. your employers / customers.

b. What is the purpose of, and basis for, the processing of Personal Data?

We process Personal Data in connection with the afore-mentioned relationships for the following purposes:

- establishing a business relationship;
- entering into and performing contracts;
- closing out contracts;
- providing replies to all questions and requests as well as maintaining further correspondence / contact in respect of a given question/request;
- marketing and contact regarding other information as well as the Controller's services;
- defending against potential claims as well as pursuing claims;
- complying with the Controller's legal obligations (e.g. those relating to public companies, tax and accounting obligations, those relating to complaint investigation).

Grounds for the Controller's processing of Personal Data include:

- necessity to perform a contract or take steps before the execution of a contract at the data subject's request;
- fulfilment of the Controller's legal obligations;
- the Controller's legitimate interest involving the marketing of the Controller's products and services or those of a third party, including maintenance of correspondence and defence against potential claims.

As a rule, providing one's Personal Data is voluntary, but may turn out to be necessary for a contract to be entered into or performed or if we want to answer a question put to us or to maintain correspondence.

c. What is the length of time for which Personal Data are processed?

Personal Data collected for the purpose of entering into and performing a contract will be processed for the duration of the term of the contract or until the time you lodge an objection against the processing of your data based on our legitimate interest unless applicable regulations (e.g. those relating to data archiving, tax laws, bookkeeping regulations) require us to process the Personal Data for a longer time period or we will store them longer to provide for cases of potential claims for the relevant limitation period prescribed by law - depending on which of those time period is longer.

Your Personal Data, furnished when contacting us, will be processed for the time period necessary for answering your question and maintaining further correspondence (if any), and then for the time period equivalent to the relevant limitation period for claims, if any.

V. Processing of Personal Data in connection with entering our site

a. What Personal Data do we process?

The Controller in respect of Personal Data collected from persons entering and staying on, the site of PCC Consumer Products Czechowice SA, including data obtained from the monitoring system, identification data and images, is PCC Consumer Products Czechowice S.A. with its registered office in Czechowice-Dziedzice (43-502) at ul. Łukasiewicza 5, Polska/Poland.

The Controller may have obtained some of your Personal Data used for identification from the organisation that booked your visit at our site using the notification system, which, as a rule, is the organisation that employs you (we collect your Personal Data prior to your visit for security reasons).

b. What is the purpose of, and basis for, the processing of Personal Data?

Your Personal Data will be processed:

- to ensure adequate security on the site which is also used by other PCC Group companies,
- to protect persons and property, particularly for the purpose of restricting access to selected zones/areas only to authorised persons,
- to provide for contingencies related to potential disputes between you and the Controller.

Grounds for the Controller's processing of Personal Data include:

- the legitimate interest of the Controller or a third party, including PCC Group companies, consisting in ensuring adequate security on the site, ensuring property protection and defending against potential claims as well as pursuing claims,
- necessity to protect the vital interests of a data subject or of another individual.

Providing your Personal Data is voluntary, but is necessary for you to be able to enter the Controller's site and stay there (failure to provide such Data will make it impossible for you to enter the premises of PCC Consumer Products Czechowice SA).

c. What is the length of time for which Personal Data are processed?

As a rule, the Controller will store your Personal Data for the length of time equivalent to the limitation period for potential claims as prescribed by law (in particular by the Civil Code), unless applicable provisions of law require us to process your Data for a longer time period or until you lodge an effective objection. As far as monitoring footage is concerned, as a rule we will store such recordings for three months unless such material is being used as evidence in legal proceedings or if we become aware that such footage could be used in proceedings at a later time - in such a case the retention period will be extended until the proceedings are finished and a final and binding decision is issued.

VI. Processing of Personal Data in connection with recruitment

The Controller in respect of the Personal Data disclosed in your job application and other data collected during the recruitment process is PCC Consumer Products Czechowice S.A., with its registered office in Czechowice-Dziedzice (43-502) at ul. Łukasiewicza 5, Polska/Poland.

a. What Personal Data do we process?

In our capacity as a Controller, we process the Personal Data of individuals seeking employment, provided through all available recruitment channels and, in particular, we process all and any Personal Data furnished to us in job applications and collected during the recruitment process.

In the context of the recruitment process we may process the following Personal Data (the processing of certain Personal Data may be subject to your consent): identification data, address particulars, details of your education, skills and employment to date, information on your licences or professional credentials as well as other Personal Data provided to us during the recruitment process.

b. What is the purpose of, and basis for, the processing of Personal Data?

We process Personal Data in connection with the recruitment process for the following purposes:

- to consider job applications and to conduct the recruitment process and, if consent is obtained - also for the purposes of future recruitment or recruitment within the PCC Group;
- to defend against potential claims as well as pursue claims.

The grounds for the Controller's processing of Personal Data include taking steps at your request, current applicable regulations, particularly the Labour Code and secondary legislation, and in relation to a scope broader than that specified in those regulations and to future recruitment, your voluntary consent which you may withdraw at any time, which will not affect the lawfulness of processing based on consent before its withdrawal. The ground for the Controller's processing of Personal Data connected with defence against potential claims is the Controller's legitimate interest. Providing Personal Data is voluntary, but necessary for conducting the recruitment process and establishing an employment relationship thereafter (if any). We may develop compilations of your Information based on the Personal Data provided which constitute your professional profile (in such a case the legal basis for Personal data processing for this purpose is also our legitimate interest consisting in finding and matching job offers that may fit your preferences).

c. What is the length of time for which Personal Data are processed?

The Controller will store your Personal Data for the length of time equivalent to the duration of the recruitment process or, depending on your additional voluntary consent, future recruitment processes or until the time your consent is withdrawn, it being understood that Personal Data will anyway be deleted, in each and every case, two years after they are obtained unless applicable provisions of law require us to store your Data for a longer time period or we will store them longer to provide for potential claims - for the length of time equivalent to the limitation period for such claims as prescribed by law, in particular by the Labour Code or Civil Code with the longer processing period prevailing in each case).

VII. Who is the recipient of your Personal Data?

Personal Data processed by us may be made available to entities that support us in sending emails and, in the case of advertising activities – also in marketing campaigns, provide support and ensure the operation of IT tools and systems (e.g. data storage), as well as entities providing courier and shipping services, providing on-going legal, accounting and financial services, performing audits, rendering services of scanning, printing, maintaining correspondence, document archiving and document destruction etc., online payment operators or banks – in the case of billing services, to entities working with the Controller as part of sales services, in the case of security monitoring - also to security companies, including as part of the above activities, also to PCC Group companies.

As for the recruitment process, your Personal Data may also be furnished to entities that provide technical or organisational support to us in our employee recruitment process, including communication with candidates, and, upon your consent, to selected PCC Group companies for the purposes of recruitment, which will improve your chances of being employed (we do not allow all PCC Group companies to have

access to your Personal Data, but only those whose recruitment process matches your job application).

Personal Data processed by us in connection with access to confidential information may also be disclosed to relevant authorities upon their request, particularly to the Financial Supervision Authority.

VIII. Personal Data outside the European Economic Area (EEA)

If, in the future, Personal Data were to be transferred to a location outside the EEA, the Controller will take appropriate steps to ensure security of Personal data, particularly by:

- using specific contractual clauses referred to as „standard contractual clauses“, approved by the European Commission; or
- transferring data to countries which have been approved by the European Commission as providing adequate level of protection.

In such a case you have the right to obtain information on security measures used, in particular by contacting us, regarding Personal Data Protection, at the email address provided in Item I.

IX. What rights do you have?

In each case you have the right:

- a. to access your Personal Data (including obtaining information on which specific Personal Data are processed);
- b. to request that your Data be rectified or to restrict the processing of your Data (e.g. if they are inaccurate);
- c. to have your Data deleted (e.g. if they have been unlawfully processed);
- d. to transmit the Personal Data which you provided to the controller and which are processed in an automated manner where the processing is based on consent or a contract, e.g. to another controller;
- e. to lodge an objection against the processing of Personal Data based on the pre-condition of necessity for the purposes arising from the legitimate interest pursued by the controller or a third party, including, in particular, against processing for marketing purposes;
- f. to lodge a complaint with President of the Office for Personal Data Protection.

If the processing of Personal Data takes place based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before withdrawal,