

Personal Data Processing Policy at
AXELO Ostrowski Domagalski i Wspólnicy sp.k.

I. General information on personal data processing

This Personal Data Processing Policy (hereinafter "Policy") explains how **AXELO Ostrowski Domagalski i Wspólnicy sp.k.** with its registered office in Rzeszów, al. Tadeusza Rejtana 20 ("AXELO"), in connection with its business activity, collects and processes personal data of natural persons, being:

- its clients, contractors, partners, co-workers, suppliers, service providers – including the potential ones;
- associates, employees, statutory representatives, attorneys-in-fact or representatives of such clients, contractors, partners, co-workers, suppliers, service providers – including the potential ones;
- other persons whose data are processed for the purposes of performing agreements between clients, contractors, partners, co-workers, service providers, suppliers and AXELO;
- persons contacting AXELO by postal mail and by phone

This Policy informs in particular about the purpose and manner of personal data processing, their storage period, legal basis for personal data processing, as well as about the rights of entities whose data we process.

We process personal data with due diligence and in accordance with the applicable laws, i.e. in particular 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, "GDPR"), respecting the right to privacy and we guarantee that the personal data will be properly protected against unauthorized access.

We exercise due diligence to protect the interests of persons whose data we process, in particular we ensure that we collect personal data for specified, legitimate purposes and do not subject them to further processing inconsistent with those purposes. We also ensure that the personal data are correct and relevant to the purposes for which they are processed and stored not longer than necessary to achieve the purposes of processing.

II. Information on personal data controller

The controller of personal data of natural persons specified above is **AXELO Ostrowski Domagalski i Wspólnicy sp.k.** with its registered office in Rzeszów, al. Tadeusza Rejtana 20, 35- 315 Rzeszów, KRS [National Court Register number]: 0000535885, NIP [tax identification number]: 8133699440, REGON [National Business Registry Number]: 360354288.

You can contact the controller on the matters connected with personal data processing at odo@axelo.pl and by mail: AXELO Ostrowski Domagalski i Wspólnicy sp.k., al. T. Rejtana 20, 35-315 Rzeszów.

II. Types of personal data and source of their collection

In relation to **the cooperation (possibility of establishing cooperation) with AXELO**, we may process personal data directly obtained from the natural persons set out in the introduction to this Policy, such as:

- names and surnames
- address of business activity and mailing addresses,
- numbers held in relevant registers (e.g. NIP or REGON),
- PESEL number,
- information on the official position,
- specific identification numbers that are not commonly assigned numbers,
- bank account number,

whereby, the scope of personal data processing is in each case determined for the purpose of processing.

In the case of the conclusion of an agreement directly between you and AXELO, the provision of data specified above is voluntary, but necessary for the conclusion and performance of the agreement. If you do not conclude an agreement directly with AXELO, the provision of personal data may be your official duty.

AXELO may also obtain your personal data from entities in which you are employed or of which you are the representatives. In such a case, the scope of the data processed will include information necessary for the performance of the agreement between AXELO and such an entity, e.g. information on the termination of employment with a given entity, change of contact details or change of the official position.

IV. Purposes, legal bases and periods of data processing

Your personal data are processed by the Controller for the purposes specified below.

For each purpose, we provide a legal basis for processing and a period of data processing for that purpose.

PURPOSE	LEGAL BASIS	PROCESSING PERIOD
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conclusion and performance of the agreement	Article 6(1)(b) of GDPR	a period of performance of the contractual obligations and a period of limitation of claims resulting from the applicable laws
performance of the agreement between AXELO and another entity – <i>If you are the persons indicated as contact persons or representatives of such an entity being a legal person</i>	Article 6(1)(f) of GDPR, i.e. legitimate interest of the controller, that is, the performance of the agreement between the controller and another entity, protection of rights, assertion and defense of claims	a period of performance of the contractual obligations and a period of limitation of claims resulting from the applicable laws or until the date on which an objection lodged pursuant to Article 21 of GDPR is upheld
fulfilment of the legal obligation to prepare and keep documentation	Article 6(1)(c) of GDPR	the time limit for storing invoices, accounts, documents confirming the conclusion and performance of the agreement resulting from the laws
confirmation of the obligation fulfilment and assertion or defense of claims	Article 6(1)(f) of GDPR, i.e. legitimate interest of the controller, that is, the protection of rights, confirmation of the obligation fulfilment and obtaining due remuneration from it	a period of performance of the contractual obligations and a period of limitation of claims resulting from the laws
Newsletter	Article 6(1)(b) of GDPR	a period of performance of the obligations under the service agreement electronically and a period of limitation of claims resulting from the laws
Presentation of the quotation in response to the request for quotation	Article 6(1)(b) of GDPR	a period of conducting negotiations preceding the conclusion of an agreement
Marketing of own services	Article 6(1)(f) of GDPR, i.e. legitimate interests of the controller, that is, informing	until the objection lodged pursuant to Article 21 of

	<p>persons that are having an ongoing relationship with the controller about the controller's services</p> <p>Article 6(1)(a) of GDPR – separate, voluntary consent given – in the case of persons not having an ongoing relationship with the controller</p>	GDPR is upheld or the consent withdrawal
Phone contact	Article 6(1)(f) of GDPR, i.e. legitimate interest of the controller that consists in the necessity of the resolution of a case reported, connected with the controller's business activity	until the objection lodged pursuant to Article 21 of GDPR is upheld
E-mail and postal mail correspondence	Article 6(1)(f) of GDPR, i.e. – legitimate interests of the controller that consists in conducting correspondence addressed to the controller connected with the controller's business activity	until the objection lodged pursuant to Article 21 of GDPR is upheld
Recruitment	<p>Article 6(1)(c) of GDPR in conjunction with the provisions of the Labor Code</p> <p>Article 6(1)(a) of GDPR – within the scope of data not required by the laws and for the purposes of further recruitment</p> <p>Article 6(1)(f) of GDPR, i.e. legitimate interest of the controller that consists in defense or assertion of claims</p>	For the duration of the recruitment process for a specific position, and in the event of giving consent to the future recruitment processes, until the consent is withdrawn (however, not longer than for 3 years)

Profiles on Facebook and LinkedIn	Article 6(1)(f) of GDPR, i.e. legitimate interest of the controller that consists in promoting the controller's own brand and improving the quality of the services provided	until the objection lodged pursuant to Article 21 of GDPR is upheld or the consent withdrawal
Initiating and maintaining business contacts	Article 6(1)(f) of GDPR, i.e. legitimate interest of the controller that consists in establishing networks of contacts in connection with the business activity, e.g. by way of exchange of business cards	until the objection lodged pursuant to Article 21 of GDPR is upheld

V. Personal data recipients

Your personal data may be disclosed to our trusted business partners, i.e. entities with whom we cooperate for the above-mentioned purposes, including in particular the suppliers responsible for maintaining information systems and equipment, entities providing bookkeeping and accounting services, entities providing legal advisory services to AXELO, entities delivering postal/courier parcels, marketing agencies, recruitment agencies, debt collection agencies and audit firms, and additionally, to third persons that will make a relevant request pursuant to the appropriate legal basis.

VI. Data security

We use all technical and organizational means to ensure the security of personal data processed and protect them against incidental or intentional damage, incidental loss, modification, unauthorized disclosure or access. The information is stored and processed on high-security servers, with appropriate safety measures, complying with the requirements of the Polish law.

We carry out an ongoing risk analysis in order to guarantee that we process the personal data in a safe manner, ensuring primarily that the data are only accessed by authorized persons and only within the scope that is necessary due to the tasks that we perform.

We make sure that all operations on personal data are recorded and carried out only by authorized workers and coworkers.

We also take all the necessary activities to ensure that also our subcontractors and other cooperating entities guarantee the application of appropriate safety measures each time they process personal data on our behalf.

VII. Entitlements connected with the personal data processing

The persons whose data we process have the following rights:

- right to access data;
- right to rectify data;
- right to remove data;
- right to limit data processing;
- right to transfer data;
- right to object (when the basis for processing is the controller's legitimate interest)
- right to withdraw consent (when the data processing is based on the consent);
- right to lodge a complaint to the supervisory authority, i.e. President of the Personal Data Protection Office.

The execution of the above rights depends on the conditions specified in GDPR. If your request is denied, you will receive a response with the reasons for the denial.

Please note that:

- the right to remove data and the right to request the limitation of their processing is applicable only in the cases set out in GDPR;
- the right to transfer data is applicable in the case when the legal basis for processing is the consent or performance of the agreement;
- the withdrawal of the consent to data processing is permissible at any time which, however, does not affect the lawfulness of the processing carried out before the withdrawal;
- objection to the data processing is permissible at any time and should include a justification (except for the objection to data processing for marketing purposes, where the justification is not required);
- we may refuse to remove data despite such a request provided that one of the exceptions listed in GDPR applies, e.g. when data processing is necessary to fulfill the legal obligation or to establish, assert or defend claims;
- in some cases, we may refuse to consider the objection to data processing based on our legitimate interest when there are significant legitimate bases for data processing that are superior to the interests, rights and freedoms of the entity objecting or there are bases for establishing, asserting and defending claims.

VIII. Amendments to the Policy

The Policy is verified on an ongoing basis and updated, if necessary.

The current version of the Policy is effective as of 2 June 2022.