DATA PROCESSING POLICY
of Zakład Produkcji Opakowań KARTON-PAK S.A

DEFINITION
The Data Controller (hereinafter referred to as the Controller): Zakład Produkcji Opakowań KARTON-PAK S.A. with registered office in Nowa Sól, ul. Hutnicza 10-12, 67-100 Nowa Sól, which decides on objectives and means of personal data processing (hereinafter referred to as Karton-Pak S.A.).

personal data: all information about an identified or identifiable natural person by means of one or several specific factors defining physical, physiological, mental, economic, cultural or social identity of a natural person, including IP number of a device, location, internet ID and information collected by means of cookie files or a similar technology.

Karton-Pak S.A. - Zakład Produkcji Opakowań KARTON-PAK S.A. with registered office in Nowa Sól, ul. Hutnicza 10-12, 67-100 Nowa Sól

personal data protection: personal data protection in Karton-Pak S.A.


SCOPE OF APPLICATION
This Data Processing Policy refers to personal data processing by Karton-Pak S.A. as the Data Controller. The Controller processes personal data of the following persons:
- counterparties – natural persons who perform business activity, representatives of a counterparty, employees and associates of a counterparty,
- persons contacting it via e-mail, traditional mail,
- persons contacting it by phone,
- persons entering the area of the Controller’s premises,
- job candidates.

Processing of data of www.kartonpak.pl users (including persons using the contact form on the website), www.b2b.kartonpak.pl users, visitors of the Controller’s profiles operated in the social media was regulated in the Privacy and Cookies Policy.

OBJECTIVES AND LEGAL GROUNDS OF DATA PROCESSING BY THE CONTROLLER

Processing of data of counterparties – natural persons who perform business activity, representatives of a counterparty, employees and associates of a counterparty

The Controller processes personal data of counterparties – natural persons who perform business activity, representatives of a counterparty, employees and associates of a counterparty who are counterparty’s contact persons in relation to execution of agreements and rendering of services. Their data may be processed by the Controller for the purpose of:
- drafting, conclusion or execution of an agreement in compliance with article 6 sec. 1 letter b of GDPR,
- fulfillment of the legal obligation in form of maintenance of accounting documents, archiving documents related to concluded agreements, deliveries, settlements, complaints, accounting documents, that is in compliance with article 6 sec. 1 letter c of GDPR (for instance in relation to the provisions of the Accountancy Act and the Tax Ordinance Act),
- maintenance of electronic circulation of documents in compliance with article 6 sec. 1 letter f of GDPR, where the Controller’s legitimate interest means an increase of accessibility and control over documents, and reduction of document processing time,
- ensuring safety and development of the Controller’s IT systems in compliance with article 6 sec. 1 letter f and c of GDPR,
- correspondence in relation to the Controller’s business activity (in ongoing business cases, including performance of agreements between your employer/entity represented by you, presentation of offers, placement of orders, responding to questions) in compliance with article 6 sec. 1 letter b and f of GDPR, the Controller’s legitimate interest means a possibility of ongoing contacts with our counterparties (including their employees/associates) in respect to business issues,
- direct marketing of our goods and services, including providing the employees of our counterparty with information about our offer and activities. The legal ground of processing is the legitimate interest (article 6 sec. 1 letter f of GDPR) meaning a possibility to perform marketing activities and increase sales,
- providing other information about the business of the company and possible forms of cooperation. The legal ground of processing is the legitimate interest (article 6 sec. 1 letter f of GDPR) meaning maintenance of business relationships with employees and associates of our counterparties.

Additionally, the Controller may process data in relation to visual monitoring, access control, in compliance with the scope of processing presented below.

**Processing of data of persons contacting Karton-Pak S.A. (via e-mail, traditional mail)**

If e-mail or traditional mail is sent to the Controller, which is not connected with services rendered for a sender or another agreement concluded with the sender, personal data from such correspondence are processed only for the purpose of communication and arranging of issues subject to such correspondence. In such case, the Controller demands disclosure of personal data only when it is necessary for the above purpose, and if failure to provide such data makes it impossible to arrange a case.

The legal ground of processing results from the Controller’s legitimate interests (article 6 sec. 1 letter f of GDPR) that is the correspondence sent to it in relation to its business activity.

The Controller processes only personal data necessary for the case subject to respective correspondence. The entire correspondence is stored in the way ensuring security of data and other information included in it and it is disclosed to authorised persons only.

If a legal relationship exists between the Controller and a person contacting it, the legal ground of processing may be related to the need to process data for the purpose of performance of a service agreement (article 6 sec. 1 letter b of GDPR).

**Processing of data of persons contacting Karton-Pak S.A. (by phone)**

If the Controller is contacted by phone in issues not related to a concluded agreement or rendered services, we may demand disclosure of personal data only when it is necessary for handling of an issue, to which a contact refers. In such case, non-disclosure will make it impossible to handle the issue concerned. The legal ground of processing results from the Controller’s legitimate interests (article 6 sec. 1 letter f of GDPR) that is a need to solve a reported issue in relation to performed business activity.

If a legal relationship exists between the Controller and a person contacting it, the legal ground of processing may be related to the need to process data for the purpose of performance of a service agreement (article 6 sec. 1 letter b of GDPR).

**Processing of data of persons entering the premises of Karton-Pak S.A.**

To ensure safety of persons and property, the Controller has visual monitoring of the area and premises and access control at the entrance, exit and in other zones managed by the Controller. At the entry and exit, personal data of a person entering the premises and registration number of entering vehicles are recorded.

Data are disclosed voluntarily, but refusal to provide data entails impossibility to enter the premises of the Company.

The legal ground of personal data processing results from the Controller’s legitimate interests (article 6 sec. 1 letter f of GDPR) that is the need to ensure security and protection of the Controller’s property.
Processing of data of job candidates
Within the scope of recruitment processes, the Controller processes personal data of job candidates (e.g. in a CV or a cover letter) only in the scope defined in the provisions of the labour law. In relation to the foregoing, candidates should not provide more information than defined in the Controller’s requirements and legal provisions.

Personal data are processed for the purpose of the recruitment processes in respect to data, which are not required by legal provisions, and for the purpose of future recruitment processes – on the ground of consent (article 6 sec. 1 letter a of GDPR) and legal provision (the Labour Code of 26 June 1974).

In the scope of personal data processing on the basis of consent, the consent may be withdrawn any time without impact on the legitimacy of personal data processing before its withdrawal. If consent is granted for future recruitment processes, data should be maintained for no longer than 6 months, unless consent is withdrawn earlier.

Data processing in other cases
In relation to performed business activity, the Controller collects personal data also in other cases, for instance during business meetings or via exchange of business cards, for the purposes related to establishment and maintenance of business contacts. In such cases, data are provided on voluntary basis. Disclosure of such data is voluntary. The legal ground in this case results from the Controller’s legitimate interests (article 6 sec. 1 letter f of GDPR) that is creation of a network of contacts related to performed business activity.

INFORMATION RECEIVED FROM OTHER SOURCES
If the Controller processes your personal data which have not been received directly from you, it processes them in relation to their disclosure to the Controller by a counterparty, that is your employer or customer, with whom the Controller cooperates.

PERIOD OF PERSONAL DATA PROCESSING
The period of personal data processing by the Controller depends on a type of rendered service and purpose of processing. If the ground of processing consists of the necessity of processing for the purpose of conclusion and execution of an agreement, data are to be processed until its termination and afterwards until expiry of possible claims (10 years after termination of an agreement).

The period of personal data processing may also result from provisions, if data are processed on their basis.

In case of data processing on the ground of the Controller’s reasonable interest, e.g. due to reasons of security, data are processed for a period enabling its fulfilment or until submission of an effective objection to data processing. If data are processed on the basis of consent, they are processed until withdrawal of such consent.

Monitoring records are stored for a period of 3 months.

The period of personal data processing may be prolonged if processing is necessary for determination, assertion of or defence against possible claims, and after such period only in case and scope required by legal provisions.

RIGHTS RELATED TO PERSONAL DATA PROCESSING
Data subjects shall have the following rights:

1. Right to access your personal data kept by us.
2. Right to demand that we rectify any incorrect personal data, which are kept by us.
3. Right to demand that we delete any information about you, that is kept by us. This right may be exercised, for instance, when:
   - we do not need your personal data any longer for the purpose, for which they were collected,
   - you withdraw your consent,
   - you object to the manner of our processing of your personal data.

   Pertaining to article 17 of GDPR, there are exceptions to this law (in particular for the purpose of determination, assertion or defence of claims).

4. Right to limit our processing of your personal data. This right may be exercised, for instance, when:
- you do not agree with correctness of your personal data, which are kept by us,
- we do not need to process your personal data any longer, but you prefer that we restrict data processing instead,
- we do not need to use your persona data for the purpose, for which they were collected, but they are necessary for the purpose of determination, investigation or defence of legal claims.

5. The right to obtain the personal data provided to us in an ordered, commonly used and machine readable format. This right shall apply when data processing is based on consent or agreement (see above) and it is automated.

6. The right to object to personal data processing due to reasons related to particular circumstances, if we process personal data on the ground of our legitimate interest, then in case of an objection we will have to stop data processing, unless we prove that there are significant justified reasons for processing, which objectively should have priority over the interests of a data subject or are necessary for determination, assertion of defence of claims (e.g. for the purpose of evidence or in case of claim assertion). The data subject shall have right to object also if processing refers to direct marketing (regardless of whether it is based on consent or our legitimate interest, the objection to or withdrawal of consent in this respect will result in cessation of data processing by us).

7. The right to withdraw consent on personal data processing any time, if personal data are processed on the basis of consent.

8. The right to submit a complaint to the Personal Data Protection Office dealing with personal data protection if you believe that personal data processing violates the GDPR provisions or other provisions on personal data protection.

DATA RECIPIENTS
In relation to performance of services, personal data may be disclosed to third parties, and in particular:

- to service providers responsible for handling of IT systems (including for programming services),
- to such entities as banks and payment operators in case of settlements,
- to entities rendering consulting services, auditors, providers of legal services,
- to couriers in relation to performance of orders, to postal operators in relation to correspondence, to carriers,
- to entities rendering security services (in case of a visit to the premises of the Company),
- to service providers responsible for maintenance of technical infrastructure – monitoring ((in case of a visit to the premises of the Company),
- possibly to other entities rendering services for the Administrator on the basis of respective agreements.

The Controller reserves the right to reveal selected information to respective authorities or third parties, that demand such information on the basis of respective legal ground and in compliance with applicable legal provisions.

DATA TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA
The level of personal data protection outside the European Economic Area (EEA) is different than the one offered by the European legislation. Therefore, the Controller does not transfer personal data outside the EEA.

PERSONAL DATA SECURITY
The Controller performs risk analysis on ongoing basis to ensure that personal data are processed by it in a secure manner and ensuring that access to data is exercised only by authorised persons and only in the scope, in which it is necessary for the purpose of tasks performed by them. The Controller shall take care that all personal data operations are executed by authorised employees and associates only.

The Controller shall undertake all necessary activities to ensure that its subcontractors and other cooperating entities guarantee that they apply appropriate safety measures in every case they process personal data on the Controller’s request.

CONTACT DATA
Contact with the Controller is possible via traditional post addressed to Zakład Produkcji Opakowań KARTON-PAK S.A., ul. Hutnicza 10-12, 67-100 Nowa Sól.
The Controller has not appointed a Data Protection Inspector. In cases related to personal data protection you may contact us in writing or via e-mail at sekretariat@kartonpak.pl.

Reply to your request should be given within a month from its receipt.

**CHANGES OF INFORMATION ON PERSONAL DATA PROTECTION**

The information on personal data protection is verified on ongoing basis and updated, when necessary. The last update was adopted and has been applicable since 27 November 2018.