

DATA PROCESSING NOTICE

Further to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), we wish to inform you on our personal data processing policy, which is as follows:

Personal Data Controller (PDC)

Profitroom S.A., Poznań 60-829, ul. Franklina Roosevelta 9, entered in the register of entrepreneurs kept by the Central Registration and Information of Business (CEIDG) under Tax Identification Number (NIP) 5252423458 ("the Controller").

Contact us by phone at **+48 61 840 23 80** or by email to contact@profitroom.com. For more information, go to our website – www.profitroom.pl.

Data Protection Officer (DPO)

Cezary Sadowski, email iod@rodo.pl.

Security of personal data

In accordance with the GDPR, your personal data will be processed, whether in writing or by electronic means, for the purposes stated below and with the use of appropriate methods to ensure the security and confidentiality of personal data as required under Article 32 of the GDPR. Our cooperation with business entities is governed by relevant laws. Your personal data will not be processed outside the EEA.

We process your personal data for the following purposes:

1. Recruitment

Legal basis: Your personal data, to the extent defined by relevant labour laws, will be processed for the purposes of the preliminary recruitment procedure (Article 6 (1) (b) of the GDPR), and other data will be processed subject to your consent (Article 6 (1) (a) of the GDPR), which may be withdrawn at any time. If any documents contain sensitive data, as mentioned in Article 9 (1) of the GDPR, such data will be processed subject to your consent under Article 9 (2) (a) of the GDPR.

Period for which your personal data will be stored: Your personal data will be processed for the duration of the recruitment procedure. Subject to your additional consent, your personal data will also be processed for the purposes of future recruitment procedures for a period of no more than 24 months, or until you withdraw your consent.

2. Employment

Legal basis: Your personal data will be processed for employment purposes, including for the purposes of keeping employee files, recording working time, meeting filing requirements, including filings with the Social Insurance Institution (ZUS) and tax filings, as well as for pay-related purposes, calculating withholdings and deductions, including for tax and social insurance purposes, storing employee files, and as evidence in proceedings before courts or other relevant state authorities, including to establish, defend and exercise claims – legal basis: the Labour Code and other laws and secondary legislation thereto, setting out the rights and obligations of employees and employers, Article 6 (1) (b) (c) (d) and (f) of Regulation (EU) 2016/679 of the European Parliament and of the Council.

In specific cases (debt collection, on-site operations monitoring), the legal basis for the processing is the legitimate interest of the Personal Data Controller (Article 6 (1) (f) of the GDPR).

Period for which your personal data will be stored: Your personal data will be stored for as long as necessary for the purposes stated above, and thereafter for as long as allowed by applicable law, but no

longer than necessary. HR and OHS data for 50 or 10 years (depending on when a person was employed) starting from the year in which the employment ended.

3. Sales of ADO's services.

Legal basis: Your personal data will be processed for the purposes of the agreement performance under Article 6 (1) (b) of the GDPR, and in order to fulfil the legal obligation stipulated by Article 6 (1) (c) of the GDPR, including in particular the provisions of the Accounting Act and the Civil Code.

Period for which your personal data will be stored: Your data will be stored for a period of 5 years starting from the first day of the year following the year in which the relevant accounting document was issued or, alternatively, for the duration of the agreement and after the expiration of any statutes of limitations for claims under applicable law.

4. Provision of support services

Source of data: Your personal data must be processed in order for any agreement relating to ADO products to be concluded. Accordingly, if you refuse to provide any personal data that are explicitly mandatory, we will be unable to provide you with the requested service.

Legal basis: Article 6 (1) (b) of the GDPR.

Period for which your personal data will be stored: As per agreement.

Data recipients: Entities described by law or other entities processing data under appropriate agreements with ADO.

5. Marketing activities related to the conducted business.

Legal basis: Article 6 (1) (a) of the GDPR and Article 6 (1) (f) of the GDPR, services marketing.

Period for which your personal data will be stored: Marketing data – until the data subject submits a personal data erasure request.

6. Future claims.

Legal basis: Article 6 (1) (f) of the GDPR.

Period for which your personal data will be stored: For the purposes of exercising potential claims, your personal data will be stored until the expiration of any statutes of limitations for claims under applicable law.

7. Personal and property security

Source of data: Surveillance camera data.

Legal basis: Article 6 (1) (f) of the GDPR.

Period for which your personal data will be stored: Up to three months from the time the material is recorded.

8. Personal and property security

Source of data: Data from GPS fleet monitoring

Legal basis: Article 6 (1) (f) of the GDPR.

Period for which your personal data will be stored: N/A

9. Customer satisfaction survey

Source of data: Data from recorded telephone conversations with customers.

Legal basis: Article 6 (1) (a) of the GDPR.

Period for which your personal data will be stored: Until the natural person withdraws his/her consent.

Should your personal data be needed for any purposes other than described above, you will be informed of this fact directly in the relevant form or during the first activity involving you.

Your personal data processing rights:

- If the legal basis is Article 6 (1) (a) or (b) of the GDPR:
 - the right to access your data
 - the right to have your data rectified
 - the right to have your data erased (the right to be forgotten)
 - the right to restrict the processing of your personal data
 - the right to data portability
- If the legal basis is Article 6 (1) (c) the GDPR:
 - the right to access your data
 - the right to have your data rectified
 - the right to restrict the processing of your personal data
- If the legal basis is Article 6 (1) (e) or (f) of the GDPR:
 - the right to access your data
 - the right to have your data rectified
 - the right to have your data erased (the right to be forgotten)
 - the right to restrict the processing of your personal data
 - the right to object to the processing of your personal data

The right to withdraw your consent:

If the data is processed on the basis of your consent (Article 6 (1) (a) of the GDPR), we will process your data until you withdraw your consent. You may withdraw your consent at any time by sending an email to iod@rodo.pl, or in person at the Data Controller's office. The withdrawal of the consent does not affect the lawfulness of the processing based on the consent before its withdrawal.

The right to lodge a complaint with a supervisory authority:

Should you identify any data processing security breach by ADO, you may lodge a complaint with the supervisory authority in charge of personal data protection – the President of the Personal Data Protection Office (UODO). The current address of the supervisory authority is as follows: Prezes Urzędu Ochrony Danych Osobowych, ul. Stawki 2, 00-193 Warszawa.

Data recipient:

For the purposes of data processing, access to your personal data may be provided to other recipients and categories of recipients such as:

- relevant public administration and local government bodies, to the extent and for the purposes permitted by applicable law.
- service providers, including in particular providers of personal data protection, audit, IT support, software, training, financial, insurance, maintenance and servicing, and correspondence services.
- any other entities processing personal data for the Data Controller under appropriate agreements.

The Data Controller may use automated decision-making, including profiling, for marketing and customer targeting purposes. Your personal data will not be processed outside the EEA.