

**PERSONAL DATA PROCESSING POLICY
OF TRANSSYSTEM S.A. WITH ITS REGISTERED OFFICE IN WOLA DALSZA
(PRIVACY POLICY)**

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DEFINITIONS**

GDPR - Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC.

Personal Data Controller (PDC) – the entity that decides on the means and purposes of personal data processing.

Processing - operations on personal data such as collecting, recording, organizing, storing, adapting or modifying, downloading, viewing, using, disclosing through uploading, distributing or otherwise providing, adjusting or combining, limiting, deleting or destroying.

Personal Data – means information about an identified or identifiable individual (“data subject”).

Data Subject – means any person whose personal data is processed by the Personal Data Controller.

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INTRODUCTION**

Ensuring the security and confidentiality of entrusted personal data by protecting the interests and rights of data subjects, as well as by adopting the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing personal data and on the free movement of such data and repealing Directive 95/46/EC, as well as the Act of 10 May 2018 on the protection of personal data and specific provisions of other Acts and executive acts issued on their basis, TRANSSYSTEM S.A., with its registered office in Wola Dalsza, Wola Dalsza 367; 37 – 100 Łańcut, registered in the Register of Entrepreneurs of the National Court Register under KRS number 0000749736, for which the registration files are kept by the District Court in Rzeszów, 12th Commercial Division of the National Court Register, with the NIP [tax identification number]: 5272704255, REGON [national business registry number]: 146958589 (hereinafter "TRANSSYSTEM") introduces this Privacy Policy. The document is aimed in particular at meeting the information obligation towards data subjects, i.e. ensuring the effective implementation of the rights and freedoms of data subjects.

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DATA SECURITY**

Implementing the rules set out in the GDPR, in particular the rules of integrity and confidentiality as well as accountability of personal data processing, TRANSSYSTEM has implemented technical and organizational security measures that guarantee the protection of the rights of data subjects, including by enabling only persons authorized by PDC to perform activities on data, selection of entities providing services to TRANSSYSTEM that meet the requirements set out in the GDPR, securing the IT

infrastructure against unauthorized access, or monitoring and recording processing activities. TRANSSYSTEM controls the applied technical and organizational solutions and regularly adjusts them to possible threats.

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PERSONAL DATA CONTROLLER

The Controller of personal data is TRANSSYSTEM S.A., with its registered office in Wola Dalsza, Wola Dalsza 367; 37 – 100 Łańcut, NIP [tax identification number]: 5272704255, REGON [national business registry number]: 146958589, KRS [company registration number]: 0000749736. You can contact the Personal Data Controller:

- by phone: +48 17 24 90 116,
- by post to the following address: Wola Dalsza 367; 37 – 100 Łańcut
- by email, to: transsystem@transsystem.pl

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PERSONAL DATA PROTECTION OFFICER

The Personal Data Controller has appointed the Data Protection Officer - Arkadiusz Korbela, who can be contacted:

- by post to the following address: Wola Dalsza 367; 37 – 100 Łańcut
- by email, to: iod@transsystem.pl

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LEGAL BASIS AND PURPOSES OF PERSONAL DATA PROCESSING

CUSTOMERS

Personal data shall be processed in order to take action at the request of the data subject before concluding the contract, i.e. presenting the offer of TRANSSYSTEM services, and in the event of concluding a contract, for the proper performance of services to the extent specified in the contract - Article 6 (1)(b) GDPR. In the event of concluding a contract, personal data shall also be processed in order to fulfill legal obligations arising from the provisions of generally applicable law, e.g. issuing and storing relevant accounting documents - Article 6 (1)(c) GDPR. TRANSSYSTEM shall process personal data pursuant to Article 6 (1)(f) GDPR, i.e. as part of its legitimate interest to collect unpaid amounts due from TRANSSYSTEM, as well as to establish and pursue claims or defend against claims. Personal data may also be processed on the basis of the above. legal basis for the internal needs of TRANSSYSTEM.

CONTRACTORS/ SERVICE PROVIDERS/ COUNTERPARTIES

Personal data shall be processed in order to perform the contract pursuant to Article 6 (1)(b) GDPR. Personal data shall also be processed in order to fulfill the legal obligations incumbent on TRANSSYSTEM, which are set out in applicable law (e.g. issuing and storing appropriate accounting documents) - Article 6 (1)(c) GDPR - legal obligation incumbent on PDC. TRANSSYSTEM may also process data in order to establish, pursue claims or defend against claims arising from the performance

of the contract. In this case, personal data shall be processed pursuant to Article 6 (1)(f) GDPR, i.e. in connection with the legitimate interest of TRANSSYSTEM.

EMAIL CORRESPONDENCE/ CONTACT VIA FORM ON THE WEBSITE

Personal data shall be processed for purposes related to the correspondence depending on its scope, among others responses to inquiries, complaints, etc. The processing of personal data shall occur successively pursuant to Article 6 (1)(b) GDPR - i.e. performance of the contract or Article 6 (1)(f) GDPR, i.e. in connection with the legitimate interest of PDC, which is the care for the proper performance of services provided by PDC and the presentation (on express request) of commercial offers included in the TRANSSYSTEM offer. Personal data may also be processed in the case of pursuing rights and defending against claims against TRANSSYSTEM. In this case, PDC shall also process personal data as part of its legitimate interest.

CONTACT BY PHONE

In the case of contact by phone, e.g. in order to get to know the PDC offer, personal data shall be processed in order to take action at the request of the data subject before concluding the contract - Article 6 (1)(b) GDPR and pursuant to Article 6 (1)(f) GDPR, i.e. in connection with the legitimate interest of PDC, which is the presentation of commercial offers included in the TRANSSYSTEM offer. PDC or an authorized employee may ask for data enabling identification of a person if such a necessity arises as part of the request to prepare and send an offer to the indicated email address.

SOCIAL MEDIA

If the data subject has subscribed to the TRANSSYSTEM fanpage by clicking the "Like", "Follow" or "Subscribe" icon, or has published a comment under any of the posts on the fanpage, PDC shall process personal data in order to run the fanpage on a given social networking site, under the terms and conditions set out by a given website and inform via it about the activity of TRANSSYSTEM, promoting organized events, products and services, in order to communicate through the available functionalities of a given website (comments, chat, messages, etc.), in order to possibly determine, investigate or defend against claims and for analytical purposes regarding the analysis of the functioning, popularity, manner of using the fanpage pursuant to Article 6 (1)(f) GDPR - the legitimate interest of PDC.

As part of the above, PDC informs that personal data is obtained from a specific social network through which the appropriate "Like", "Follow" or "Subscribe" icon was clicked, or entries made on a fanpage on a given portal. PDC shall process basic identification data, i.e. name and surname in the scope published by the data subject on the profile of a given social networking site and anonymous statistical data on visitors to the fanpage, which is collected thanks to "cookies", each of which contains a unique code user, which can be associated with the connection data of the user registered on the website, and which is downloaded and processed when the fanpage is opened.

RECRUITMENT

In the case of submitting/sending a CV or a cover letter to TRANSSYSTEM, personal data shall be processed in connection with the ongoing recruitment and taking steps by PDC before the conclusion

of the contract, as well as in connection with the legal obligations incumbent on TRANSSYSTEM, which result from the Act of 26 June 1974, Labor Code. If the personal data included in the CV or cover letter exceeds the scope specified in Article 221 of the Act of 26 June 1974, the Labor Code, PDC shall process it under the consent granted, i.e. pursuant to Article 6 (1)(a) GDPR. PDC shall also process personal data for the purposes of future recruitment, but only if it obtains permission for such activities in the form of an appropriate consent of the data subject.

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RIGHT TO WITHDRAW CONSENT

The data subject has the right to withdraw consent to the processing of personal data granted pursuant to Article 6 (1)(a) GDPR at any time without affecting the lawfulness of the processing, which was made on the basis of consent given before its withdrawal. A declaration of withdrawal of consent to the processing of personal data must be submitted in writing to the following address: Wola Dalsza 367; 37 – 100 Łańcut, by email to: transssystem@transssystem.pl or in person at the registered office of the Personal Data Controller.

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DATA RECIPIENTS

Personal data processed by PDC may be disclosed to entities processing personal data under concluded entrustment agreements or to other data controllers processing personal data on their own behalf (depending on the legal basis and purpose of personal data processing), e.g. entities providing accounting, auditing, insurance, legal assistance, entities conducting postal or courier activities, entities providing ICT services (e.g. maintenance of IT systems), providing tools or operating ICT systems, as well as authorized entities, if they demonstrate a legal or factual interest in receiving personal data, e.g. Courts, Prosecutor's Office, Bailiffs or the Police.

PDC may transfer personal data to third countries, i.e. countries outside the European Economic Area. Data may be transferred only to third countries or entities for which the European Commission has found an adequate level of data protection. The list of countries for which the European Commission issued a decision confirming that a third country provides an adequate level of protection can be found at the following link:

https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

In the absence of a decision of the European Commission stating the adequate level of protection specified in Article 45 (3) GDPR, personal data may be transferred to a third country only on under: binding corporate rules, standard data protection clauses adopted by the European Commission, standard data protection clauses adopted by the Polish supervisory authority and approved by the Commission, an approved code of conduct or an approved certification mechanism (Article 46 GDPR).

In the absence of a decision of the European Commission stating the adequate level of protection specified in Article 45 (3) GDPR or lack of appropriate safeguards specified in Article 46 GDPR, including binding corporate rules, the Personal Data Controller shall process personal data only and exclusively under express consent to such transfer to a third country or international organization, while informing

about the prior risk associated with such transfer pursuant to Article 49 (1)(a) GDPR. In connection with the transfer of data outside the EEA, you may request information on appropriate safeguards in this regard, obtain a copy of these safeguards or information about the place where it is made available by contacting PDC using the data indicated in Section 4 above.

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DATA PROCESSING PERIOD

TRANSSYSTEM processes personal data taking into account the legal basis and purpose of processing while maintaining the periods of personal data processing, as well as:

- if the basis for the processing of personal data is consent (Article 6(1)(a) GDPR), PDC processes personal data until it is withdrawn.
- if the basis for the processing of personal data is Article 6 (1)(b) GDPR, i.e. in order to perform the contract or take action at the request of the data subject before concluding the contract, PDC processes data until its performance (unless the obligation to continue processing results from applicable law, e.g. the Act of 29 September 1994 on accounting).
- when the processing of personal data is determined by the provisions of applicable law (Article 6(1)(c) GDPR), then PDC processes personal data for the period resulting from these relevant provisions.
- if TRANSSYSTEM processes personal data on the basis of a legitimate interest (Article 6(1)(f) GDPR), then personal data is processed until this interest is fulfilled or until an objection is raised. The period of data processing may be extended if it is necessary to establish, pursue claims or defend against claims.

After the last of the purposes for which the data was obtained (including the limitation of claims under applicable law) is achieved, personal data is immediately deleted or archived, taking into account the relevant provisions of GDPR.

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SCOPE OF RIGHTS

In connection with the processing of personal data by TRANSSYSTEM and in order to ensure fairness and transparency of processing, PDA informs about the following rights of data subjects:

- The right to access data, including the right to obtain a copy of data - PDC provides the data subject with information about the purposes and legal grounds for processing, as well as the scope of data that is processed. PDC also provides a copy of the data to the person requesting a copy of the data,
- The right to rectify data (correct data) - PDC, at the request of the data subject, rectifies incorrect data or completes incomplete data.
- The right to delete data (the so-called "right to be forgotten") - the data subject may request the PDC to delete data if, in his/her opinion, it does not serve any purpose of processing.
- The right to limit data processing - PDC stops processing personal data only for its storage or performance of activities agreed with the data subject, where the data is incorrect or is processed unlawfully, as well as in cases where PDC does not need the collected data but it is

needed by the data subject to establish, pursue claims or defend against claims or for the duration of the objection to processing,

- The right to object - the data subject may object to the processing of personal data concerning him/her at any time, unless PDC demonstrates the existence of valid - legally justified grounds for processing,
- The right to transfer data - the data subject has the right to receive data concerning him/her from PDC in a format that makes it possible to read the data by a computer. The data subject also has the right to request that the data be sent (if technically possible) to another entity.

PDC is not obliged to implement all of the above right, to any extent and in any case. Specific rights are granted depending on the legal basis on which the processing occurs and what is its purpose. If, on the basis of specific provisions, PDC is not obliged to implement any of the above rights, it shall provide appropriate explanations to the data subject in this respect.

PDC also informs about the right to lodge a complaint with the supervisory authority if, in the opinion of the data subject, personal data is processed in a manner inconsistent with applicable law. The supervisory body for the protection of personal data is the President of the Personal Data Protection Office (ul. Stawki 2; 00 – 193 Warsaw).

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OBLIGATORY/VOLUNTARY PROVISION OF DATA

Providing PDC with personal data that is processed pursuant to Article 6 (1)(a)(f) GDPR is voluntary. When processing is performed pursuant to Article 6 (1)(b) GDPR, then providing data is a contractual requirement or a condition for concluding a contract. Providing data covered by Article 6 (1)(c) GDPR, i.e. the legal obligation imposed on PDC is a statutory condition. Failure to provide personal data, depending on the specific reason for processing specified above, may result in the inability of PDC to achieve the individual purposes for which personal data is collected.

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DATA SUBJECTS RIGHTS IMPLEMENTATION

PDC communicates with the data subject in a concise, transparent, intelligible and easily accessible form, in clear and simple language, and also conducts communication regarding processing. The information shall be provided in writing or otherwise, including electronically where appropriate, as well as orally, provided that the identity of the data subject is confirmed.

The response shall be provided without undue delay, and in any case within one month of receipt of the request. If necessary, this period may be extended by other two months due to the complexity of the request or the number of requests. Within one month of receiving the PDC request, I shall inform the data subject about such an extension.

PDC does not charge any fees as part of the above communication, however, it may charge a reasonable fee, taking into account the administrative costs of providing information, communication or taking the requested actions.

PDC may refuse to take action in connection with the request if the requests of the data subject are manifestly unjustified or excessive, in particular due to their repetitive nature.

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AUTOMATED DECISION MAKING AND PROFILING

Personal data is not processed in an automated manner and is not subject to profiling.