



## INFORMATION CLAUSE

In fulfilment of the requirements of 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 Processing Regulation, GDPR), we inform you of the rules applicable to the processing of your personal data and of your rights related thereto.

1. **TIRSPED Sp. z o.o.** with its registered office in Warsaw (03-193), ul. Spedycyjna 22, entered in the register of entrepreneurs maintained by the District Court, 13th Commercial Division of the National Court Register under No KRS 0000014439, is the controller of your personal data.
2. The data controller shall process your personal data pursuant to the applicable provisions of the law and concluded contracts and based on your consent.
3. Your expression of consent to the processing of your personal data is **freely given** but may be necessary for the presentation of an offer and for the conclusion and performance of a contract.
4. Where the processing of personal data is based on Article 7 of GDPR, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
5. Your personal data shall be processed **solely** where necessary for:
  - a) the performance of a contract to which you are party pursuant to Article 6(1)(b) of GDPR;
  - a) the entering into a contract based on your interest in an offer pursuant to Article 6(1)(b) of GDPR;
  - c) compliance with legal obligations to which the Controller is subject pursuant to Article 6(1)(c) of GDPR;
  - d) the preparation of offers, the conduct of surveys to measure clients' satisfaction with the services and products offered to them in order to determine and possibly improve their quality, the responding to queries, requests and complaints, and the provision of customer service support as the legitimate interest pursued by the Controller pursuant to Article 6(1)(f) of GDPR;



e) the exercise or defence of legal claims as the legitimate interest pursued by the Controller pursuant to Article 6(1)(f) of GDPR.

6. You have the following rights in connection with the processing of your personal data:

- a) the right to access personal data, including to obtain a copy thereof;
- b) the right to rectification (correction) of personal data where the data are inaccurate or incomplete;
- c) the right to erasure of personal data ('right to be forgotten') in the event where:
  - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - the data subject objects to the processing of personal data;
  - the data subject withdraws consent on which the processing of personal data is based, and there is no other legal ground for the processing;
  - the personal data have been unlawfully processed;
  - the personal data have to be erased for compliance with a legal obligation;
- d) the right to restriction of processing in the event where:
  - the accuracy of the personal data is contested by the data subject;
  - the processing of personal data is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the Controller no longer needs the personal data for its own purposes, but they are required by the data subject for the establishment, exercise or defence of a legal claim;
  - the data subject has objected to processing of personal data pending the verification whether the legitimate grounds of the Controller override those of the data subject;
- e) the right to data portability where the following cumulative conditions are fulfilled:
  - the processing of personal data is based on a contract with, or consent of, the data subject;
  - the processing is carried out by automated means;
- f) the right to object to the processing of your personal data unless the Controller demonstrates legitimate grounds, including but not limited to legitimate interests, for the processing which override your interests, rights and freedoms and where such data are necessary for the establishment, exercise or defence of legal claims;
- g) the right to lodge a complaint with the Office for Personal Data Protection (the Office of the President



of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warszawa) if the processing of your personal data violates the provisions of the General Data Protection Regulation of 27 April 2016.

7. In relation to the processing of personal data for the purposes referred to in item 5, the following entities may be recipients of your personal data:
  - a) public authorities and bodies performing public tasks or acting on behalf of public authorities, to the extent and for the purposes resulting from the provisions of generally applicable law;
  - b) entities that are members of the Controller's group of companies;
  - c) entities cooperating with, and providing services to, the Controller, including but not limited to transport, courier, insurance, storage and logistics firms, port and airport terminals, railway operators, control companies, shipping companies and airlines;
  - d) other entities which process, based on relevant contracts, the personal data controlled by TIRSPED Sp. z o.o., including but not limited to law and IT firms.
8. Your personal data shall be processed for the period of time necessary for the purposes specified in item 5 and thereafter for the period of time required by the provisions of generally applicable law. This period shall not be longer than **6 years** counted from the end of the calendar year in which the tax obligation arose in accordance with the tax ordinance.
9. Your personal data may be processed by automated means and may be profiled.
10. The Controller is not planning to transfer your personal data to any third countries.
11. The foregoing rules shall apply from 25 May 2018.