

## PERSONAL DATA PROTECTION POLICY

### Administrator:

**SVANTEK SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ** with its registered office in Warsaw (04-872) at ul. Strzygłowska 81, entered in the Register of Entrepreneurs of the National Court Register, maintained by the District Court for the Capital City of Warsaw, 13<sup>th</sup> Economic Division of the National Court Register, under KRS number 0000192065, NIP (Tax Identification No.): 5270105272, REGON (Statistical no.): 002175672.

*This Personal Data Protection Policy, hereinafter referred to as Policy, is drawn up in order to confirm that your personal data is processed and secured in accordance with the applicable requirements of the law concerning data processing and securing, including the 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 (hereinafter referred to as GDPR).*

### Definitions:

1. **Data Controller** – SVANTEK SP. Z O.O. with its registered office in Warsaw at ul. Strzygłowska 81, entered in the Register of Entrepreneurs of the National Court Register, maintained by the District Court for the Capital City of Warsaw, 13<sup>th</sup> Economic Division of the National Court Register, under KRS number 0000192065, NIP (Tax Identification No.): 5270105272, REGON (Statistical no.): 002175672.
2. **SVANTEK SP. Z O.O.** - SVANTEK SP. Z. O.O. with its registered office in Warsaw at ul. Strzygłowska 81, entered in the Register of Entrepreneurs of the National Court Register, maintained by the District Court for the Capital City of Warsaw, 13<sup>th</sup> Economic Division of the National Court Register, under KRS number 0000192065, NIP (Tax Identification No.): 5270105272, REGON (Statistical no.): 002175672.
3. **Personal Data** – all information pertaining to an identified or identifiable natural person;
4. **Filing system** – any structured set of personal data which is accessible according to specific criteria;
5. **Data processing** – any operation or set of operations which is performed on Personal Data or on sets of personal data, such as collection, recording, compiling, altering, disclosing and erasing, whether in traditional form or in IT systems.

### I. General Provisions

1. The Policy applies to Personal Data processed in SVANTEK SP. Z O.O. regardless of the form of processing thereof (i.e. traditionally processed data registers or IT systems), and whether the data is or may be processed in filing systems.
2. We receive your Personal Data:
  - a) when you use the contact form available on our website,
  - b) via e-mail,
  - c) when you are concluding a relevant agreement with our company,
  - d) when you consent to receive marketing communications,

- e) by recording the user's interactions with our websites, products and services (i.e. using cookies).
3. The Data Controller ensures that all activities related to the processing and securing of personal data conform to this Policy and the relevant provisions of the law.

## **II. Personal Data processed by the Data Controller, and the basis and purpose of processing thereof**

1. Data acquired by SVANTEK SP. Z O.O. are used:

- 1) primarily for marketing purposes related to the products and services offered by SVANTEK SP. Z O.O. The basis for the processing is Article 6 sec. 1 letter a) of GDPR, i.e. the data subject's consent. Data shall be processed for the purposes of marketing of third-party products until the data subject withdraws their consent.
- 2) for the conclusion and efficient performance of agreements. In this case, the basis for data processing is Article 6 sec. 1 letter b) of GDPR, i.e. the necessity of processing for the performance of contracts. If a contract is concluded, data shall be processed throughout the term of such contract, and may be processed also after the contract has expired, but only if permitted or required by the applicable laws, e.g. processing for statistical or settlement purposes, or for the purpose of pursuing claims.
- 3) for statistical assessment (this should be understood to include also data analysis and profiling for marketing purposes) of the Data Controller's products and services. The basis for such processing is Article 6 sec. 1 letter f) of GDPR, i.e. the Data Controller's legitimate interests. Data processed for this purpose shall be processed until the data subject effectively objects to processing.

2. In the processing of Personal Data, SVANTEK SP. Z O.O. employs the services of processors.

3. Providing your Personal Data is voluntary, however, failing to provide data designated as required for the provision of the services, shall prevent the provision thereof and consequently the performance of the agreement.

## **III. Security management**

1. All types of Personal Data are processed in accordance with the rules specified by the relevant provisions of the law:
  - a) In each case, there is at least one basis for processing specified by the relevant provisions of the law.
  - b) Data is processed in a reliable and transparent manner.
  - c) Personal Data is collected for specific, clear and legitimate purposes, and not processed further in manner inconsistent with those purposes.
  - d) Personal Data is processed only to the extent necessary for the specific purpose of data processing.
  - e) Personal Data is accurate and updated as necessary.

- f) The data retention time is limited to the period of usefulness of the data for the purposes for which they have been collected; afterwards, the data is either anonymised or erased.
  - g) The data subject is provided with the relevant information as required by Article 13 and Article 14 of GDPR.
2. The data is secured against any protection violations.
3. SVANTEK SP. Z O.O. implements the appropriate technical and organisational measures to ensure the level of security of Personal Data Processing corresponding to the risks of varying likelihood and severity for rights and freedoms of natural persons.
4. SVANTEK SP. Z O.O. takes the necessary steps to ensure that its employees and associates apply the appropriate security measures each time they are processing Personal Data for the Data Controller.

#### **IV. Infringements of personal data protection rules**

1. In the event of any identified personal data breach, the Data Controller shall assess whether the breach in question might have caused any risks for rights and freedoms of natural persons.
2. In each instance when the breach might have caused risks for rights and freedoms of natural persons, the Data Controller shall report the data breach to the relevant supervisory authority without undue delay – if possible, not later than within 72 hours from detecting the breach.
3. If the risk to rights and freedoms is considered high, the Data Controller shall also notify the data subject.
4. In accordance with Article 33 sec. 5 of GDPR, the Data Controller shall document all personal data breaches.

#### **V. Authorisation to process personal data**

1. The Data Controller may authorise a third party to process the personal data solely on the basis of a written contract concluded in accordance with the requirements set forth in Article 28 of GDPR.
2. Prior to authorising a third party to process the personal data, the Data Controller shall obtain, to the extent available, the data processor's previous record of securing personal data.
3. The Data Controller represents that some entities working together with SVANTEK which are authorised by the Data Controller to sell SVANTEK's products and services, collect and store personal data outside the territory of the European Union. The activities of third-party service providers are verified for compliance with the regulations of the European Union and the applicable local laws on the processing and protection of personal data.

#### **VI. Rights of the data subject**

##### **SVANTEK Sp. z o. o.**

Strzygłowska 81  
04-872 Warsaw, Poland  
tel.: 22 518 83 20  
e-mail: office@svantek.com.pl

Registered in  
the Warsaw District Court  
XIII Economic Department  
Initial Capital 100 000 zł

KRS 0000192065  
REGON 002175672  
VAT PL 5270105272

**sound and vibration  
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1. With respect to the processing of your Personal Data by the company, you have the following rights:
  - a) the right of access to your personal data (including the right to obtain confirmation of whether your personal data is processed and information, e.g. on the purposes, sources or categories of processed data, or the period of retention thereof), which also includes the right to obtain a free-of-charge copy of your data,
  - b) the right of rectification of personal data, which also includes rectifying incomplete Personal Data,
  - c) the right to erase personal data (the so-called “right to be forgotten”) when the data is no longer required for the purposes, for which it has been collected, you have withdrawn your consent to the processing of your data, or there is no legal basis for the processing of your data,
  - d) the right to resign from the subscription to promotional e-mails using the subscription resignation function provided in the foot of each promotional e-mail received from us,
  - e) the right to restrict processing of personal data,
  - f) the right to object to processing of personal data,
  - g) the right to withdraw your consent to the processing of personal data,
  - h) the right to lodge a complaint with the President of the Personal Data Protection Office in the event of an infringement of the provisions of GDPR.

## VII. Correspondence

You can contact us:

- by traditional mail sent to our office at ul. Strzygłowska 81, 04-872 Warsaw, Poland,
- by e-mail sent to [marketing@svantek.com.pl](mailto:marketing@svantek.com.pl)