

PERSONAL DATA PROCESSING POLICY IN COBALTBLUE LIMITED LIABILITY COMPANY LIMITED PARTNERSHIP

1. DICTIONARY:

1.1 **Administrator** – **CobaltBlue Sp. z o.o. Sp. k.** with registered office in Warsaw, ul. Sady Żoliborskie 2/55, entered into the register of enterprises of the National Court Register kept by the District Court for the Capital City of Warsaw, XII Commercial Department under number 0000529652.

1.2 **Personal data** – all information about a physical person identified or identifiable by one or more specific factors determining physical, physiological, genetic, mental, economic, cultural or social identity, including image, voice recording, contact details, location data, information contained in correspondence, information collected through recording equipment or other similar technology.

1.3 **Policy** – this Policy covering the processing of personal data.

1.4 **RODO** – 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 of personal data and in on the free movement of such data and repealing Directive 95/46 / EC.

1.5 **Data subject** – any natural person whose personal data are processed by the Administrator, e.g. a person visiting the Administrator's premises or sending an e-mail inquiry to it.

2. DATA PROCESSING BY THE ADMINISTRATOR

2.1 In connection with the conducted business activity, the Administrator collects and processes personal data in accordance with the relevant provisions, including in particular the GDPR, and the principles of data processing contained therein.

2.2 The Administrator ensures the transparency of data processing, in particular, always informs about the processing of data at the time of collection, including the purpose and legal basis for processing - e.g. when concluding a contract for the sale of services. The administrator ensures that data is collected only to the extent necessary for the purpose indicated and processed only for the period in which it is necessary.

2.3 By processing data, the Administrator ensures their security and confidentiality and access to processing information to data subjects. If, despite appropriate security measures, there was a violation of personal data protection (e.g. "leakage" of data or their loss), the Administrator will inform the data subjects about such an event in a manner consistent with the provisions.

3. CONTACT WITH THE ADMINISTRATOR

3.1 Interested in processing personal data by the Administrator may contact the Company in all matters regarding the processing of their personal data, including matters related to the exercise of their rights:

3.1.1 by e-mail at: [biuro @ cobaltblue .com.pl](mailto:biuro@cobaltblue.com.pl),

3.1.2 by post at: CobaltBlue limited liability company limited partnership ul. Sady Żoliborskie 2/55, 01-772 Warsaw,

3.1.3 by phone at (22) 839 69 06 The Administrator has not appointed a Data Protection Officer.

4. SECURITY OF PERSONAL DATA

4.1 In order to ensure data integrity and confidentiality, the Administrator has implemented procedures enabling access to personal data only to authorized persons and only to the extent necessary due to the tasks they perform. The administrator applies organizational and technical solutions to ensure that all operations on personal data are recorded and carried out only by authorized persons.

4.2 The Administrator also undertakes all necessary actions so that its subcontractors and other cooperating entities guarantee the use of appropriate security measures whenever they process personal data on behalf of the Administrator.

4.3 The Administrator conducts ongoing risk analysis and monitors the adequacy of the data security measures used for the identified threats. If necessary, the Administrator implements additional measures to increase data security.

5. OBJECTIVES AND LEGAL BASIS FOR PROCESSING E-MAIL AND TRADITIONAL CORRESPONDENCE

5.1. In the case of sending to the Administrator via e-mail or traditional correspondence unrelated to the services provided to the sender or another contract concluded with him, the personal data contained in this correspondence are processed solely for the purpose of communication and solving the case to which the correspondence relates.

5.2. The legal basis for processing is the Administrator's legitimate interest (Article 6 paragraph 1 letter f of the GDPR) consisting in conducting correspondence addressed to him in connection with his business activities.

5.3. The administrator processes only personal data relevant to the case to which correspondence relates. All correspondence is stored in a manner that ensures the security of personal data contained therein (and other information) and disclosed only to authorized persons.

5.4. In the event of contacting the Administrator by phone, in matters not related to the contract or services rendered, the Administrator may request personal data only if it is necessary to handle the case to which the contact relates. In such a case, the legal basis is the Administrator's legitimate interest (Article 6 paragraph 1 letter f of the GDPR) consisting in the need to resolve the reported case related to his business activity.

5.5. Telephone conversations can also be recorded - in this case appropriate information is provided at the beginning of the conversation. Calls are recorded to monitor the quality of the service provided.

5.6. Personal data in the form of a conversation recording are processed:

5.6.1 to perform obligations arising from legal provisions related to the employment process, in particular the Labor Code - the legal basis for processing is the legal obligation incumbent on the Administrator (Article 6 (1) (c) of the GDPR in connection with the provisions of the Labor Code);

5.6.2 to carry out the recruitment process in the field of data not required by law, as well as for the purposes of future recruitment processes - the legal basis for processing is consent (art.6 par.1 lit.a RODO);

5.6.3 in order to determine or assert any claims or defend against such claims - the legal basis for data processing is the legitimate interest of the Administrator (Article 6 paragraph 1 point f of the GDPR).

5.6.4 in the event of collecting Personal Data for purposes related to the performance of a specific contract, the Administrator provides the Data Subject with detailed information regarding the processing of his Personal Data at the time of concluding the contract.

5.6.5 in connection with its activities, the Administrator also collects Personal Data in other cases:

a. in connection with its operations, the Administrator also collects personal data in other cases - e.g. during business meetings, at industry events or by exchanging business cards - for purposes related to initiating and maintaining business contacts. In this case, the legal basis for processing is the Administrator's legitimate interest (Article 6 paragraph 1 point f of the GDPR) consisting in creating a network of contacts in connection with the business.

b. to handle and process orders. The legal basis for processing in this case is Art. 6 clause 1 letter b GDPR.

5.7. As part of recruitment processes, the Administrator expects personal data to be provided (e.g. in a CV or curriculum vitae) only to the extent specified in labor law. Therefore, information should not be provided more widely. If the submitted applications contain additional data, they will not be used or included in the recruitment process.

5.8. In the event of collecting data for purposes related to the performance of a specific contract, the Administrator provides the data subject with detailed information regarding the processing of his personal data at the time of concluding the contract.

5.9. Personal data collected in such cases are processed only for the purpose for which they were collected, and the Administrator provides them with adequate protection.

6. DATA RECIPIENTS

6.1 In connection with conducting operations that require processing, personal data are disclosed to external entities, including in particular suppliers responsible for operating IT systems and equipment, entities providing legal or accounting services, couriers, recruitment agencies.

6.2 The Administrator reserves the right to disclose selected information about the data subject to competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with applicable law.

7. TRANSMISSION OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

7.1 The level of protection of personal data outside the European Economic Area is different from that provided for by European law. For this reason, the Administrator transfers personal data outside the European Economic Area only when it is necessary and with an adequate level of protection, primarily through:

7.1.1 cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued;

7.1.2 application of standard contractual clauses issued by the European Commission;

7.1.3 applying binding corporate rules approved by the competent supervisory authority;

7.1.4 in the event of transferring data to the USA - cooperation with entities participating in the Privacy Shield program approved by the decision of the European Commission. The administrator always informs about the intention to transfer personal data outside the European Economic Area at the stage of their collection.

8. THE PERIOD OF PERSONAL DATA PROCESSING

8.1 The period of data processing by the Administrator depends on the type of service provided and the purpose of processing. The period of data processing may also result from provisions when they constitute the basis for processing. In the case of data processing on the basis of the Administrator's legitimate interest - e.g. for security reasons - the data are processed for a period enabling the implementation of this interest or to object effectively to data processing. If the processing is based on consent, the data is processed until its withdrawal. When the basis for processing is necessary to conclude and perform the contract, the data is processed until its termination.

8.2 The period of data processing may be extended if the processing is necessary to establish or pursue claims or defend against claims, and after this period - only if and to the extent required by law. After the end of the processing period, the data is irreversibly deleted or anonymized.

9. RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA RIGHTS OF PERSONS WHO THE DATA CONCERNS

9.1. Data subjects have the following rights:

9.1.1 information about the processing of Personal Data - on this basis, the person submitting the request, the Administrator provides information about the processing of Personal Data, including primarily the purposes and legal grounds for processing, the scope of Personal Data held, entities to which it is disclosed and the planned date for the removal of Personal Data;

9.1.2 obtain a copy of Personal Data - on this basis, the Administrator provides a copy of the processed Personal Data regarding the person submitting the request;

9.1.3 rectification - the Administrator is obliged to remove any incompatibilities or errors of Personal Data processed and supplement them if they are incomplete;

9.1.4 deletion of Personal Data - on this basis, you can request the deletion of data whose processing is no longer necessary to pursue any of the purposes for which it was collected;

9.1.5 processing restrictions - if such a request is made, the Administrator ceases to perform operations on Personal Data - with the exception of operations for which the Data Subject has consented and their storage - in accordance with the adopted retention rules or until the reasons for limiting the processing of Personal Data (e.g. a decision of the supervisory authority will be issued authorizing further processing of Personal Data, period of checking the correctness of Personal Data by the Administrator);

9.1.6 transferring Personal Data - on this basis - to the extent that Personal Data is processed in an automated manner in connection with the concluded agreement or consent - the Administrator issues Personal Data provided by the Person to whom they relate, in a commonly available format allowing their reading by computer. It is also possible to request that Personal Data be sent to another entity - however, provided that there are technical possibilities in this regard both on the part of the Administrator and that other entity;

9.1.7 objection to the processing of Personal Data for marketing purposes - The data subject may at any time object to the processing of Personal Data for marketing purposes, without the need to justify such an objection;

9.1.8 object to other purposes of processing Personal Data - the data subject may at any time, for reasons related to his particular situation, object to the processing of Personal Data which is based on the justified interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to the protection of property); the opposition in this respect should include a justification;

9.1.9 withdrawal of consent - if Personal Data are processed on the basis of expressed consent, the Data Subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before the withdrawal of consent;

9.1.10 complaints - in the event that the processing of Personal Data violates the provisions of the GDPR or other provisions regarding the protection of Personal Data, the Data Subject may lodge a complaint to the supervisory body dealing with the protection of Personal Data in the Member State of habitual residence of the Data Subject, her workplace or the place of the alleged violation. In Poland, the supervisory authority is the President of the Office for Personal Data Protection.

10. REPORTING REQUESTS RELATED TO THE IMPLEMENTATION OF RIGHTS

10.1. The application for exercising the rights of data subjects can be submitted:

10.2 in writing to the address: CobaltBlue limited liability company limited partnership, ul. Sady Żoliborskie 2/55, 01-772 Warsaw,

10.3 by e-mail to the following address: biuro@cobaltblue.com.pl

10.4 If the Administrator will not be able to identify the person submitting the application on the basis of the application, he will ask the applicant for additional information.

10.5. The application may be submitted in person or through a representative (e.g. a family member). For reasons of data security, the Administrator encourages to use a power of attorney in a form certified by a notary public or an authorized legal advisor or lawyer, which will significantly accelerate the verification of the authenticity of the application.

10.6 A response to the application should be given within one month of receipt. If it is necessary to extend this period, the Administrator shall inform the applicant about the reasons for the delay.

10.7 The answer shall be given by traditional mail, unless the application has been submitted by e-mail or the response has been requested in electronic form.

11. CHARGING RULES

11.1 The procedure regarding the applications is free of charge. Fees can only be charged for:

11.1.1 submitting a request for a second and each subsequent copy of the data (the first copy of the data is free); in this case, the Administrator may request payment of PLN 50. The above fee includes administrative costs associated with the implementation of the request.

11.1.2 submitting excessive (e.g. extremely frequent) or manifestly unfounded requests by the same person; in this case, the Administrator may request payment of PLN 50. The above fee includes the costs of communication and the costs associated with taking the desired action.

11.2. If the decision to impose a fee is questioned, the data subject may submit a complaint to the President of the Office for Personal Data Protection.

12. CHANGES TO THE PERSONAL DATA PROCESSING POLICY

12.1 The policy is reviewed on an ongoing basis and updated as necessary. The current version of the Policy was adopted on May 25, 2018.