

## PRIVACY POLICY

### 1. Who is the administrator of your personal data?

The Administrator of personal data (hereinafter referred to as “**Data**”) processed by us in relation to our commercial activity is ENPROM Sp. z o.o. with its head office in Warsaw, address: ul. Taneczna 18c, 02–829 Warsaw, entered into the Entrepreneurs Register of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under KRS number: 0000365831, company capital: 1.125.000,00 PLN, NIP: identification number: 701-02-61-504, REGON: 14261466, (hereinafter referred to as “**Administrator**” or “**ENPROM**”).

Personal data collected by the Administrator via the website, and within the activity it conducts to execute contracts for third parties, is processed according to 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 (General Data Protection Regulation)(hereinafter referred to as as “**GDPR**”) as well as the Polish Personal Data Protection Act of 10 May 2018.

Data means all and any information with a natural person that is identified or possible to be identified. A natural person that is possible to be identified is a person who can be directly or indirectly identified, especially basing on identifier such as name and surname, identification number, localization number, internet identifier or one or several special factors that relate to physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

### 2. How do we process Data?

ENPROM puts special care into protection of interests of the people identified in the Data. It provides, that the collected Data is:

- processed according to the law, reliably and clearly for the person who is related to the Data;
- collected in specific, clear and legally justified purposes, and no longer processed in a way non-compliant with these purposes;
- adequate, relevant and limited to what is necessary in order to execute the purposes of their processing;
- correct and, if necessary, updated;
- kept in a form that enables identification of the person relevant to the Data during the period no longer than it is necessary for the purposes for which the Data is processed
- processed in a way that provides proper Data safety, including protection against unlawful or non-compliant processing and accidental loss, damage or destruction, via proper technical or organizational measures.



### **3. When do we process Data?**

We process Data in many cases. Your data can be processed if you shared your Data personally, via various communication channels (e.g. sending your application form, question /offer via e-mail or by phone) or within our cooperation when concluding or executing an agreement, but also when we collected your data from other sources (e.g. from a company with which you cooperate and that is our subcontractor/customer) or when we have direct contact with you when executing the contract by the Administrator.

### **4. Legal basis of personal data processing**

If we are granted your agreement to process your personal data, the legal basis of processing is article 6(1a) of the General Data Protection Regulation (GDPR).

In case of personal data processed for execution of the agreement in which one of the Party is a data subject, the legal basis is article 6(1b) of GDPR. It applies also to processing that is necessary to start activities before the agreement is concluded. If personal data processing is necessary to fulfill the legal obligation imposed on ENPROM, the legal basis is article 6(1c) of GDPR. If essential interests of the data subject or a different natural person require personal data processing, the legal basis is article 6(1d) of GDPR.

If data processing is necessary to secure the justified interest of ENPROM or a third person legally, and if interests, basic rights and freedoms of the data subject are no more important than those first ones, the legal basis to processing is article 6(1f) of GDPR.

### **5. Data removal and period of keeping**

Personal data of the data subject shall be removed or blocked as soon as the purpose of keeping such data is no longer valid. Moreover, data can be kept if it was foreseen in legal provisions of EU or Poland in regulations, acts or other provisions that the administrator is a subject to. Blocking or removal of data shall be done also after the period of data keeping as defined in the mentioned legal acts, unless it is required to keep the data in order to conclude or execute an agreement.

### **6. "Cookies"**

Administrator uses its own "cookies" in order to better learn the way a user interacts with the administrator's website. Files collect data on usage of the ENPROM website by the user, type of website from which the user was redirected, and the number of visits and their time at the website. Cookies do not collect personal data of the user, but are used to prepare statistics of website usage.

The user can decide about the access that the "cookies" have to their computer by choosing them in an internet browser window. Detailed information on possibility and means to use the "cookies" are available in software settings of the internet browser.



The legal basis to process the data using “cookies” for technical requirements is article 6 (1f) of GDPR. In case when the user gives their consent, the legal basis to process personal data using “cookies” for the purpose of analysis is article 6 (1a) of GDPR.

## **7. Privacy policy in terms of Facebook users**

Our website has plug-ins by Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA (hereinafter referred to as “Facebook”). Facebook is a social media website. Each plug-in can be recognized by the Facebook logo or the “Like” button. A full list of all Facebook plug-ins can be found at: [developers.facebook.com/docs/plugins](https://developers.facebook.com/docs/plugins).

Directly after visiting our website, the Facebook plug-in connects the internet browser with Facebook servers directly. Facebook is informed about visit of a user with a given IP address at our website. When a user is logged to Facebook, they can use the “Like” button to enable access to contents published at our website through their Facebook profile. In such case, Facebook can assign visit of a user to our website to their Facebook account. As an administrator of the website, we are not informed about the transferred data or their use by Facebook. Additional information can be found at: [pl-pl.facebook.com/policies](https://pl-pl.facebook.com/policies).

If a registered Facebook user does not wish for Facebook to receive their data through our website or connect their information about user account, they have to log out from Facebook before entering our website.

## **8. Privacy policy regarding the use and application of the Google Analytics service (with anonymization function)**

Our website uses Google Analytics. It is an analytic service for websites, offered by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA („**Google**”). Google Analytics uses the so-called “cookies”. “Cookies” are files. By keeping “cookies” at the user’s computer, Google is able to analyze how they use our website. Such information, including an anonymous IP address of the user, are sent to servers of Google in USA and kept there.

ENPROM uses „\_gat.\_anonymizeIp” extension to analyze websites via Google Analytics. Thanks to this, IP address of the user is shortened and becomes anonymous..

Google analyzes information on how a user uses our website. Such data is used to create reports on actions of a user at our website and to share them with ENPROM. It may be also used to offer or provide other services necessary to use our website or the internet. Google may give this information to third parties, if it is required by law or if such third parties are authorized by Google to process such data.

It is possible to prevent saving “cookies” at the user’s computer. In order to do this, the user has to set proper settings of their browser. However, it is possible that you will only be able to use our website to a limited extent.. The user is able to prevent Google from collecting, transfer, and processing their data and IP address. In order to do this, the user has to download a plug-in for their browser. This plug-in is available at: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).



## 9. Privacy policy in terms of LinkedIn users

Our website has plug-ins by to LinkedIn social media service by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter referred to as **"LinkedIn"**). LinkedIn plug-ins can be recognized by the logo or a "Recommend" button. It has to be remembered that when visiting our website, the plug-in connects between your browser and a LinkedIn server. Thus LinkedIn is informed that our website was visited by a user with a particular IP address. When clicking "Recommend" by LinkedIn and logging into your account in LinkedIn, it is possible to link contents from our websites at your LinkedIn profile. This way, LinkedIn can assign your visit at our website to a particular account or user. We wish to assure you that we do not have any knowledge on data contents transferred to LinkedIn or how LinkedIn uses it.

Detailed information on data collection, legal options and possible settings can be provided by LinkedIn. They are available at: [www.linkedin.com/static](http://www.linkedin.com/static).

## 10. Privacy policy in terms of Twitter users

Our website has services provided by Twitter Inc., 795 Folsom Street, Suite 600, San Francisco, CA 94107, USA (re hereinafter referred to as **"Twitter"**). Using Twitter, and especially the "Re-Tweet" function, causes connection of the user Twitter account with the visited websites. Such information is shared with other Twitter users, and especially the ones who follow the user profile. Such data is also transferred to Twitter.

As an administrator of the website, we are not informed about the transferred data or their use by Twitter. Additional information can be found at: [twitter.com/privacy](https://twitter.com/privacy).

It has to be remembered that Twitter privacy settings can be changed in account settings at: [twitter.com/account/settings](https://twitter.com/account/settings).

## 11. Privacy policy in terms of YouTube users

This website has at least one YouTube plug-in. The administrator of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA (hereinafter referred to as **"YouTube"**). Youtube, LCC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

When visiting our websites with a YouTube plug-in, a direct connection to YouTube servers is made. Moreover, YouTube server is informed which subsite of our website was visited by the user. And the user who is logged into their YouTube account at the same time agrees for YouTube to directly connect their internet activity to their private profile. It can be turned off when logging out from the account before visiting our website. Detailed information on collecting and using user data by YouTube can be read in Privacy Policy of YouTube, available at: <https://policies.google.com/privacy?hl=pl>.



## **12. Data processing in terms of business relations and contact**

### **a. What data do we process in relation to business relations and contact?**

As an Administrator, we process Data of our business partners (investors, subcontractors etc.), their employees and cooperators, Data of other persons that was transferred to us during execution of agreements, and Data of other persons who contacted us via telephone or e-mail.

We can process the following Data in relation to business relations and contact: Identification data, telephone and address data, employment position and professional allowances, and any other data transferred to us in relation to cooperation and contact.

The abovementioned Data is collected directly from persons who are involved in the Data, as well as from other people, such as their employers or contractors.

### **b. What is the purpose and basis for Data processing in relation to business relations and contact?**

In relation to business relation and contact, we can process the Data for the following purposes:

- start of cooperation;
- conclusion and execution of agreement;
- settlement of agreement;
- giving answer to any questions or applications that were sent to us and further correspondence / contact in the matter;
- protection against possible claims, and in order to send such claims.

The basis for Data processing by the Administrator is:

- necessity to execute the agreement or start activities before conclusion of the agreement by request of the person who is involved in the Data;;
- execution of legal obligations imposed by the Administrator;

Disclosure of Data is done freely, however it may be necessary to conclusion or execution of an agreement or to give response to a question, or to correspond.

### **c. How long will the Data be processed in relation to business relations and contact?**

Data collected for the purpose of conclusion and execution of an agreement shall be processed by the period of agreement, and then until the limitation period of possible claims.

Data of persons who contacted the Administrator shall be processed for the period necessary to respond and possible further correspondence, and then until the limitation period of the possible claims.



**d. Who is the receiver of the Data in relation to business relations and contact?**

Data processed in relation to business relations and contact may be sent to our business partners (e.g. investors, subcontractors within cooperation for the project or investment) and to our other contractors who support us in work organizing, IT services and marketing.

**13. Data processing in recruitment process**

[Information clause for employee candidates](#)

**14. Data processing of real estate administrators**

[Information clause for property owners](#)

**15. Is your data transferred outside of the European Economic Area?**

Your data is not transferred outside of the European Economic Area (hereinafter referred to as “EEA”), and if in the future there would be a transfer to a place outside of the territory of EEA, the Administrator takes proper steps in order to provide Data protection, especially by:

- using particular contractual clauses, called “standard contractual clauses”, which were approved by the European Commission; or
- transfer to the countries which have their protection level approved by the European Commission's decision.

In such case, you are entitled to be given a copy of particular protections.

**16. What are you entitled to?**

Basing on the rules set by the current provisions, you are entitled to:

- access your Data, including obtaining a copy thereof;
- request correcting, removal or limiting processing of your Data;
- object to the processing;
- transfer your Data to a different administrator (within the scope that the basis to processing is the necessity to execute the agreement, or you consent).

If Data is processed basing on your consent, you are entitled to withdraw the consent to processing at any moment with no impact on legal compliance of Data Processing processing that had already been done before the consent was withdrawn.

You are always entitled to lodge a complaint to the President of the Personal Data Protection Office.



**17. Contact with ENPROM:**

In personal data protection cases, please send e-mail to: [odo@enprom.pl](mailto:odo@enprom.pl).

