

## Who is the controller of personal data?

The administrator of the personal data is Armatura Kraków S.A. with its seat in Kraków (ul. Zakopiańska 72, 30-418 Kraków), hereinafter referred to as hereinafter referred to as Armatura.

## What personal data does the Administrator process?

**Armatura, as a controller of personal data within the meaning of the RODO, processes the following personal data in particular:**

- Personal data of job candidates (data that candidates provide to the administrator, in connection with participation in the recruitment processes - in particular, data contained on CVs)
- Personal data of contractors and their representatives (data of business entities, in terms of their representatives and representatives, as well as contact persons - basic data for the execution of contracts, issuance and posting of invoices (name, TIN, business address) and for contact (name, surname, name of the company, job position, e-mail address, telephone number))
- Data of persons reporting product complaints / Data of persons reporting damages (name / company name, address, telephone number, e-mail address, information on the subject and cause of the complaint, proof of purchase, bank account number - if applicable, data necessary to carry out the process of liquidation of damages)
- Persons sending inquiries via contact forms, e-mail and telephone (basic contact information (name, surname, e-mail address) provided by persons in connection with questions sent to the administrator)

## On what basis does the Administrator process personal data?

- **Personal data of job applicants**
  - **Purposes of data processing:** Personal data are processed for the purposes of the indicated recruitment process or also for the purposes of future recruitment processes in the event that appropriate consent is given. In certain cases (with the candidate's consent), the data may also be processed to verify the fact of employment with previous employers.
  - **Recipients of the data:** The data may be made available to entities authorized by law. Infrastructure and IT service providers processing data on behalf of Armatura may also have access to the data on the basis of relevant contracts.
  - **Basis for processing:** The basis for data processing is the applicable legal regulations (in particular the Labor Code Labor Code) and the consent granted for data processing.
  - **Storage period:** The personal data processed by the administrator will be stored until the end of the the recruitment process or until the consent granted is revoked in the case of data processing for future recruitment processes.
  - **Obligation/voluntariness of providing data:** Providing personal data to the extent required by law, in particular the particularly the Labor Code, is mandatory, otherwise it is voluntary.
  - **Information on automated decision-making:** In the processing of personal data, Armatura does not make decisions by automated means.
  - **Data processing outside the EEA:** As a rule, Armatura does not transfer data outside the European Economic Area (hereinafter EEA), however, there may be situations where Armatura will use IT service providers whose servers may be located outside the EEA. In this case, the basis for the transfer of data will be the standard contractual clauses approved by the European Commission.

### Personal data of contractors and their representatives

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Sąd Rejonowy dla Krakowa Śródmieścia, XI Wydział Gospodarczy  
Kapitał zakładowy: 114 000 000 zł, wpłacony w całości  
Alior Bank SA, nr.: PL 47 2490 0005 0000 4520 8316 8137

- **Purposes and basis of data processing:** The contractor's personal data will be processed:
  - for the purpose of executing agreements entered into between the parties (Article 6(1)(b) RODO),
  - for the purpose of fulfilling obligations imposed on the administrator under applicable laws, in particular those arising, among others, from the Accounting Act and the VAT Act (Article 6(1)(c) RODO),
  - in order to defend against claims as well as to establish and assert claims, which is a legitimate interest of the Administrator (Article 6(1)(f) RODO).
- Personal data of representatives of contractors (including, in particular, employees and associates of contractors) will be processed:
  - for contact purposes, including for the purpose of establishing and conducting business contacts and ensuring the fulfillment of contracts concluded with Contractors, which constitutes a legitimate interest of the Administrator (Article 6(1)(f) RODO),
  - in order to fulfill obligations imposed on the Administrator under applicable laws, in particular those arising, among others, from the Accounting Act and the VAT Act (Article 6(1)(c) RODO),
  - in order to defend against claims as well as to establish and assert claims, which is a legitimate interest of the Administrator (Article 6(1)(f) RODO).
- **Source of data:** personal data was obtained directly from you or from your employer/contractor.
- **Scope of processed data:** The Administrator processes data in the following scope: name, surname, position, telephone number, e-mail address and other information provided in contracts and other documents related to cooperation with the Administrator.
- **Recipients of the data:** The data may be made available to entities authorized by law. Access to the data on the basis of relevant contracts may also be provided to entities supporting Armatura in the scope of its legal obligations (e.g. to law firms and tax offices) and providers of infrastructure and IT services processing data on behalf of Armatura.
- **Retention period:** Personal data of contractors and their representatives will be retained until the purposes specified in the paragraph "Purposes and basis of data processing" are fulfilled and then for the period required by law/until claims expire.
- **Obligation/voluntariness of providing data :** Where data is obtained directly from you, the provision of such data is voluntary, however, necessary for the conclusion/performance of the contract between your employer/principal and Armatura.
- **Information about automated decision-making:** In the processing of personal data, Armatura does not makes decisions by automated means.
- **Processing of data outside the EEA:** As a general rule, Armatura does not transfer data outside the European Economic Area (hereafter the EEA), however, there may be situations where Armatura will use IT service providers whose servers may be located outside the EEA. In this case, the basis for the transfer of data will be the standard contractual clauses approved by the European Commission.

#### Data of persons claiming products / Data of persons claiming damages

- **Purposes of data processing:** Personal data will be processed:
  - for the purpose of handling the complaints process, to carry out activities related to the performance of duties in the handling of the complaints process,
  - for the defence of claims as well as the establishment and assertion of claims (on the basis of Article 6(1)(f) RODO).

- **Recipients of data:** Personal data may be made available to entities authorised by law. Access to the data on the basis of the relevant contracts may also have:
  - external service providers with whom Armatura Kraków S.A. has concluded a cooperation agreement for the handling of complaints
  - companies dealing with liquidation of property damage, with which Armatura Kraków S.A. concluded an agreement on cooperation in the scope of liquidation of damages resulting from defects of products of Armatura Kraków S.A.
  - entities supporting Armatura within the scope of its legal obligations (e.g. to law firms) and providers of infrastructure and IT services processing data on behalf of Armatura.
- **Grounds for processing:** The grounds for processing personal data are:
  - Article 6(1)(b) RODO - the necessity of processing the data for the performance of a contract to which the data subject is a party, including in particular the performance of the complaints process
  - Article 6(1)(c) RODO - applicable legislation, including in particular the Civil Code
- **Storage period:**
  - 5 full calendar years - for cases unrelated to financial settlements, damages or litigation;
  - 7 full calendar years - for cases linked to financial settlements;
  - 10 full calendar years - for cases linked to damages or litigation.
- **Obligation/voluntariness of providing data:** Provision of personal data is voluntary, however, it is necessary in order to fulfil the legal obligations incumbent on Armatura Kraków S.A., including the complaint process.
- **Information on automated decision-making:** In the processing of personal data, Armatura does not makes decisions by automated means.
- **Data processing outside the EEA:** As a general rule, Armatura does not transfer data outside the European Economic Area (hereinafter EEA), however there may be situations where Armatura will use IT service providers whose servers may be located outside the EEA. In this case, the basis for data transfer will be the standard contractual clauses approved by the European Commission.

#### Persons sending enquiries via contact forms, e-mail and telephone

- **Purposes of data processing:** Personal data will be processed for the purposes of electronic correspondence and to carry out actions taken at their request.
- **Recipients of the data:** The data may be made available to entities authorised by law. Access to the data on the basis of relevant contracts may also be granted to providers of infrastructure and IT services processing the data on behalf of Armatura.
- **Basis of data processing:** The basis of data processing is the legitimate interest of the Administrator, which is to conduct electronic correspondence and to implement actions taken at the request of data subjects.
- **Storage period:** Personal data will be stored until the purposes stated in the paragraph "Purposes of data processing" have been fulfilled.
- **Voluntariness / Obligation to provide data:** The provision of personal data is voluntary, however it is necessary for the exchange of electronic correspondence or for the actions taken at the request of the persons concerned.
- **Information on automated decision-making:** In the processing of personal data, Armatura does not makes decisions by automated means.
- **Processing of data outside the EEA:** As a general rule, Armatura does not transfer data outside the European

Economic Area (hereinafter EEA), however there may be situations where Armatura uses IT service providers whose servers may be located outside the EEA. In this case, the basis for data transfer will be the standard contractual clauses approved by the European Commission.

## What rights do you have in relation to Armature's processing of your personal data?

Every person whose data is processed has the right to:

- request access to your personal data, rectification, erasure and restriction of processing, to object to the processing of your personal data and to the portability of your personal data;
- to withdraw the consent you have given at any time (if you have given it). Withdrawal of consent, does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.
- lodge a complaint to a supervisory authority (PUODO - President of the Office for Personal Data Protection)

## Where can I contact in relation to questions about the processing of personal data and the exercise of my rights?

All enquiries and declarations regarding the aforementioned rights should be addressed to the contact details below:

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- **Data Protection Officer contact details:**
- Email address: [ido.rodos@kfa.pl](mailto:ido.rodos@kfa.pl)
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- **Contact details of the data controller:**
- Armatura Kraków S.A. ul. Zakopiańska 72 in Kraków