

# PERSONAL DATA PROTECTION POLICY



## Obligation to protect personal data

As a rapidly growing company managing expedition points, we are aware that the trust, credibility and reliable approach to business are our greatest assets appreciated by Customers, business partners and employees.

Therefore, as a company that values the right to privacy and protection of personal data processed in connection with our business, we have established this personal data protection policy, which obliges us, our directors and employees to protect and process data in accordance with:

- **Principle of lawfulness, impartiality and transparency.**  
Personal data processed by the Company will be collected and processed in a lawful, impartial and transparent manner, in order to protect the individual rights of data subjects.
- **Principle of limiting the use of data for specific purposes.**  
Personal data processed by the Company will be acquired only for clearly defined and legitimate purposes and will not be processed in a way not related to them.
- **Principle of correctness/accuracy of data.**  
Personal data processed by the Company will be correct and, as far it is necessary, updated.
- **Principle of saving/minimizing data.**  
Personal data processed by the Company will be adequate and relevant, and its scope will be limited to the necessary minimum. Personal data will not be retained longer than necessary.
- **Principle of respecting the rights of data subjects.**  
The company respects the rights of all entities indicated in the GDPR. What rights are entitled under the provisions of GDPR, you can read [here \(PDF\)](#) and how to request to exercise the right, read [here \(PDF\)](#).
- **Principle of informing data subjects about the processing of personal data.**  
The company undertakes to fulfil towards data subject the information obligation specified in Art. 12 and 13 GDPR at the time of processing personal data.
- **Principle of safe processing of personal data.**  
Personal data will be processed by the Company in a safe manner. According to the type of risk, technical or organizational measures will be undertaken against unauthorized processing or modifying as well as losing, destruction or unauthorized disclosure or sharing personal data being transferred, stored or otherwise processed.
- **Principle of data protection in the design stage and data protection by default.**  
The company undertakes to process by default only this personal data the processing of which is necessary for specific purposes. The principle of data protection in the design stage and data protection by default will be applied when developing new services.
- **Principle of Responsibility.**
  - The company undertakes that all data processing activities will be carried out in a responsible manner, and each data subject is liable for compliance and able to demonstrate it. If a violation of personal data protection takes place, which will result in negative consequences for the person

affected by the violation, we will inform you about the occurrence of such an event in the form of:

- SMS to the phone number provided;
- e-mail to the e-mail address provided;
- by letter to the address of residence provided;
- or by posting information on the website [www.cargotor.com](http://www.cargotor.com).

## **Principle of informing data subjects about the processing of personal data**

### **What is the information obligation?**

*The legal basis for the information obligation is Art. 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April, 2016 on the protection of individuals in connection with processing of personal data and on the free flow of such data, and repealing the Directive 95/46/EC (general regulation on data protection), hereinafter referred to as "Regulation" or "GDPR".*

### **Information obligation towards:**

- Our current, former and potential Customers and their employees - **here (PDF)**,
- Our subcontractors and their employees - **here (PDF)**,
- Towards our employees and former employees - **here (PDF)**,
- Towards job applicants - **here (PDF)**,
- Towards senders of electronic correspondence - **here (PDF)**,
- Towards guests visiting offices, covered with video monitoring - **here (PDF)**,
- Entities participating in pending tender procedures - **here (PDF)**.



Information obligation in connection with the processing of personal data of Customers, former Customers and/or potential customers by Cargotor Sp. z o.o.

## **Who is the Data Administrator?**

The administrator of the processed personal data of Customers, former Customers and/or potential Customers is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13. The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with the note: Personal Data Protection.

## **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

## **Purpose and legal grounds for personal data processing?**

Personal data is processed in connection with the presentation of a commercial offer and conducted business talks (marketing), performance of a signed agreement (agreement), fulfilment of an obligation arising from the provisions of law (law) or in connection with retaining necessary information as regards the defence against or pursuing claims arising from the performance of an agreement and responding to submitted letters complaints (legitimate interest of the Administrator).

We process personal data for the purposes of:

- concluding and performing the agreement, pursuant to art. 6 para. 1(b) of the "Regulation";
- issuing and booking sales invoices, pursuant to art. 6 para. 1(b) of the "Regulation";
- processing payments and settlements, pursuant to art. 6 para. 1(a) and (b) of the "Regulation";
- handling service activities, pursuant to art. 6 para. 1(b) of the "Regulation";
- conducting analyses and statistics, pursuant to art. 6 para. 1(f) of the "Regulation";
- conducting marketing activities, pursuant to art. 6 para. 1(f) of the "Regulations";
- establishing, defending and pursuing claims, pursuant to art. 6 para. 1(f) of the "Regulation";
- archiving data and documents, pursuant to art. 6 para. 1(f) of the "Regulation";
- responding to letters, applications and complaints, pursuant to art. 6 para. 1(b) and (f) of the "Regulation";

### Data processing is based on:

- expressed consent, pursuant to art. 6 para. 1(a) of the "Regulation";
- on the basis of an agreement to which you are a party or to undertake actions at your request before concluding an agreement, pursuant to art. 6 para. 1(b) of the "Regulation";
- legal obligation incumbent on the Administrator, arising in particular from the provisions of law, pursuant to art. 6 para. 1(c) of the "Regulation" e.g.;
  - Tax Ordinance Act of August 29, 1997,
  - Accounting Act of September 27, 1994,
- protection of vital interests (life and health) of you or another person, pursuant to art. 6 para. 1(d) of the "Regulation";
- legitimate interest pursued by the Administrator or by a third party, pursuant to art. 6 para. 1(f) of the "Regulation";

### **Voluntary nature or obligation to provide personal data?**

When the processing of personal data arises from a request of a person before concluding an agreement (business talks) or in connection with a concluded agreement (Article 6 (1) (b)), from the applicable provisions of law (Article 6 (1) (c)) or the Administrator's legitimate interest in establishing, defending against and pursuing claims and responding to letters, complaints (Article 6 (1) (f)), providing data it is voluntary, but necessary for the conclusion and performance of an agreement. In the event of failure to provide the indicated personal data, we may refuse to conclude an agreement or conclude it on less attractive terms and conditions, not reply to a submitted letter or complaint, or refuse to present a commercial offer as per your expectations.

When the processing of personal data is based on the consent granted or a specific purpose, e.g. sending invoices by electronic means, the provision of data is voluntary, same as the consent. One should also remember that you have the right to withdraw the consent granted at any moment. Withdrawal of consent does not affect the legality of processing of personal data which was made according to the consent granted before its withdrawal.

### **How long do we retain personal data?**

Period of retaining your personal data depends on the purpose for which the data is being processed. It is pursuant to legal provisions (which require to retain data for a specific period of time) or is necessary for the performance of an agreement or legitimate interests pursued by the Administrator or by a third party.

### Examples of periods for which personal data may be retained:

- data regarding correspondence not related to the performance of an agreement, complaints - **12 months from the end of the purpose of its processing;**
- data needed to issue an invoice and accounting documents, handling of payments and settlements - **5 years from the end of the tax period;**
- data regarding the performance of an agreement - **up to 10 years;**
- analysis and statistics - **up to 10 years;**

- data regarding court judgments (abuses) - **10 years from the date of verdict;**
- marketing activities - **until consent is withdrawn or objection raised.**

## **Do we transfer personal data and to whom?**

Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant the concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions;
  - fraud detection and prevention, and resolving other problems regarding fraud, security and technical issues;
  - protect the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.

We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## **Do you have rights in connection with processing of your personal data?**

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;
- **right to obtain a copy of data** - on this basis, we will provide a copy of the processed data regarding your person;
- **right to correct data** - on this basis, you have the right to request that the processed data be corrected,
- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to limit processing** - on this basis, you can request to end operations on personal data - except of operations for which consent has been given - and its storage, as per the adopted retention principles or until the reasons for limiting data processing cease to exist (e.g. a decision of a supervisory authority authorizing further data processing is issued);
- **right to transfer data** - on this basis - to the extent that the data is processed solely for the purpose of performing the agreement or on the basis of a consent given in an automated manner - one can request the release of stored personal data in a machine-readable format. It is also possible to request this data to be sent to another entity - provided, however, that there are technical possibilities in this regard, both on the part of the Administrator and on the part of the other entity;
- **right to raise an objection to processing of data for marketing purposes** - on this

basis, one can object to the processing of personal data for marketing purposes at any time, without the need to justify such objection;

- **right to raise an objection to other purposes of data processing** - on this basis one can raise an objection to processing of personal data at any moment, which is based on the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to the protection of property), the objection in this regard should contain grounds;
- **right to withdraw consent** - on this basis, only when personal data is processed on the basis of a consent given, the consent may be withdrawn at any moment, which, however, does not affect the legality of processing carried out before the consent was withdrawn;
- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## How can I exercise certain rights?

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure. You bring the right of complaint to the President of the Data Protection Office. All necessary information you will find at [www.uodo.pl](http://www.uodo.pl)

## Is the data subject to automated processing?

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that has legal effects or significantly affects you.

## What personal data can we process?

Depending on the relationship between the natural person and the Administrator, we may process in particular, the following personal data acquired directly from the data subject or personal data of third parties made available by business entities (employers):

- personal data (e.g. name and surname, address of permanent residence/residence);
- details on entity (e.g. name and address of an entity, data of a representative);
- contact details (e.g. mailing address, telephone number, e-mail address);
- identification data (e.g. number and series of ID card, PESEL number, NIP number);
- transactional data (e.g. data related to payment of liabilities, details of bank account);
- communication data (e.g. data originating from correspondence);
- contract data (e.g. data originating from signed contracts, agreements);
- data regarding legal connections (e.g. information necessary to implement instructions as per a power of attorney or authorization);
- publicly available data (e.g. data from the land and mortgage register);
- technical data (e.g. data on the property, status of collateral, etc.);
- correspondence data (e.g. content of correspondence).

## **From where do we acquire personal data?**

We acquire personal data mainly from a data subject (that is, from you). However, in justified cases, e.g. to confirm data or verify statements submitted, we may acquire data from:

- Register of Entrepreneurs of the National Court Register;
- Central Register of Economic Activity.



## Information obligation in connection with the processing of personal data of subcontractors and their employees by Cargotor Sp. z o.o.

### **Who is the Administrator of personal data?**

The administrator of personal data of subcontractors and their employees is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13. The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with the note: Personal Data Protection.

### **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

### **Purpose and legal grounds for personal data processing?**

Personal data is processed in connection with the performance of an agreement for the provision of service (agreement), fulfilment of an obligation arising from the provisions of law (law) or in connection with retaining necessary information as regards the defence against or pursuing claims arising from the performance of an agreement and responding to submitted letters complaints (legitimate interest of the Administrator).

#### We process personal data for the purposes of:

- concluding and performing an agreement, pursuant to art. 6 para. 1(b) of the "Regulation";
- issuing and booking invoices, pursuant to art. 6 para. 1(b) of the "Regulation";
- processing payments and settlements, pursuant to art. 6 para. 1(a) and (b) of the "Regulation";
- conducting analyses and statistics, pursuant to art. 6 para. 1(f) of the "Regulation";
- establishing, defending against and pursuing claims, pursuant to art. 6 para. 1(f) of the "Regulation";
- archiving data and documents, pursuant to art. 6 para. 1(f) of the "Regulation";
- responding to letters, requests and complaints, pursuant to art. 6 para. 1(b) and (f) of the "Regulation";
- conducting marketing of own products and services, pursuant to art. 6 para. 1(f) of the "Regulation".

#### Data processing is based on:

- consent given, pursuant to art. 6 para. 1(a) of the "Regulation";



- an agreement or to undertake actions before concluding an agreement, pursuant to art. 6 para. 1(b) of the "Regulation";
- legal obligation incumbent on the Administrator, arising in particular from the provisions of law, pursuant to art. 6 para. 1(c) of the "Regulation" e.g.;
  - Tax Ordinance Act of August 29, 1997,
  - Accounting Act of September 27, 1994,
- legitimate interest pursued by the Administrator or by a third party, pursuant to art. 6 para. 1(f) of the "Regulation";

## **Voluntary nature or obligation to provide personal data?**

When the processing of personal data arises from an agreement concluded (Art. 6 para.1(b)), from the applicable provisions of law (Art. 6 para. 1(c)) or the Administrator's legitimate interest in connection with establishing, defending against and pursuing claims and responding to letters, complaints (Article 6 para. 1(f)), providing data it is voluntary, but necessary for the conclusion and performance of an agreement. In the event of failure to provide the personal data indicated, we may refuse to conclude an agreement.

When the processing of personal data is based on the consent granted for a specific purpose, e.g. sending invoices by electronic means, the provision of data is voluntary, same as the consent. One should also remember that you have the right to withdraw the consent granted at any moment. Withdrawal of consent does not affect the legality of processing of personal data which was made according to the consent granted before its withdrawal.

## **How long do we retain personal data?**

Period of retaining your personal data depends on the purpose for which the data is being processed. It is pursuant to legal provisions (which require to retain data for a specific period of time) or is necessary for the performance of an agreement or legitimate interests pursued by the Administrator or by a third party.

### Examples of periods for which personal data may be retained:

- Correspondence data or complaints - **12 months from the end of purpose of its processing;**
- data needed to issue an invoice and accounting documents, handling of payments and settlements - **5 years from the end of the tax period;**
- data regarding the performance of an agreement - **up to 10 years;**
- analysis and statistics - **up to 10 years;**
- data regarding court verdicts (abuses) - **10 years from the date of verdict.**

## **Do we transfer personal data and to whom?**

### Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant the concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions,

- fraud detection and prevention, and resolving other problems regarding fraud, security and technical issues,
- protect the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.

We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## **Do you have rights in connection with processing of your personal data?**

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;
- **right to obtain a copy of data** - on this basis, we will provide a copy of the processed data regarding your person;
- **right to correct data** - on this basis, you have the right to request that the processed data be corrected,
- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to limit processing** - on this basis, you can request to end operations on personal data - except of operations for which a consent has been given - and its storage, as per the adopted retention principles or until the reasons for limiting data processing cease to exist (e.g. a decision of a supervisory authority authorizing further data processing is issued);
- **right to transfer data** - on this basis - to the extent that the data is processed solely for the purpose of performing the agreement or on the basis of a consent given in an automated manner - one can request the release of stored personal data in a machine-readable format. It is also possible to request this data to be sent to another entity - provided, however, that there are technical possibilities in this regard, both on the part of the Administrator and on the part of the other entity;
- **right to raise an objection to other purposes of data processing** - on this basis one can raise an objection to processing of personal data at any moment, which is based on the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related marketing of own goods or services), the objection in this regard should contain grounds;
- **right to withdraw consent** - on this basis, only when personal data is processed on the basis of a consent given, the consent may be withdrawn at any moment, which, however, does not affect the legality of processing carried out before the consent was withdrawn;
- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## How can I exercise certain rights?

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you will find at [www.uodo.pl](http://www.uodo.pl)

## Is the data subject to automated processing?

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that has legal effects or significantly affects you.

## What personal data can we process?

Depending on the relationship between the natural person and the Administrator, we may process in particular, the following personal data acquired directly from the data subject or personal data of third parties made available by business entities (employers):

- personal data as regards the representative representing an entity and/or its employee (e.g. name and surname, position);
- details on entity (e.g. name and address of an entity, data of a representative);
- contact details (e.g. mailing address, telephone number, e-mail address);
- identification data (e.g. NIP number, KRS number, REGON number);
- transactional data (e.g. data related to payment of liabilities, details of bank account);
- communication data (e.g. data originating from correspondence);
- contract data (e.g. data originating from signed contracts, agreements);
- data regarding legal connections (e.g. information necessary to implement instructions as per a power of attorney or authorization);
- publicly available data (e.g. data from KRS, data from CEDIG).

## From where do we acquire personal data?

We acquire personal data mainly from a data subject (that is, from you).

However, in justified cases, e.g. to confirm data or verify statements submitted, we may acquire data from:

- Register of Entrepreneurs of the National Court Register;
- Central Register of Economic Activity.

## **Who is the Administrator of personal data?**

The administrator of personal data of employees, associates or former employees and associates is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13 The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with the note: Personal Data Protection.

## **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

## **Purpose and legal grounds for personal data processing?**

Personal data is processed in connection with establishing your employment relationship in the company(contract) and fulfilling duties specified by the employer in the provisions of law (law) or in connection with retaining necessary information in connection with defending against or pursuing claims arising from employment relationship (legitimate interest of the Administrator).

### We process personal data for the purposes of:

- concluding and performing an agreement, pursuant to art. 6 para. 1(b) of the "Regulation";
- keeping HR documents, pursuant to art. 6 para. 1(c.) of the "Regulation";
- processing payments, pursuant to art. 6 para. 1(a) and (b) of the "Regulation";
- conducting analyses and statistics, pursuant to art. 6 para. 1(f) of the "Regulation";
- establishing, defending and pursuing claims, pursuant to art. 6 para. 1(f) of the "Regulation";
- responding to letters, pursuant to art. 6 para. 1(b) and (f) of the "Regulations".

### Data processing is based on:

- consent given, pursuant to art. 6 para. 1(a) of the "Regulation";
- agreement and internal regulations, pursuant to art. 6 para. 1(b) of the "Regulation", e.g.:
  - Employment contract,
  - Regulations of the corporate Social Benefits Fund,
  - Regulations regarding management of company's cars,
  - Regulations regarding the use of provided IT devices and electronic mail,

- legal obligation incumbent on the Administrator, arising in particular from the provisions of law, pursuant to art. 6 para. 1(c) of the "Regulations" e.g.;
- Labour Code of June 26, 1974,
  - Act on private income tax of July 26, 1996,
  - Act on social insurance system of October 13, 1998,
  - Act on corporate social insurance fund of March 4, 1994,
  - Regulation of the Minister of Labour and Social Policy of May 28, 1996 on the scope of documentation kept by employers in matters related to the employment relationship, and ways of keeping employee's personal files,
  - Regulation of the Minister of Health and Social Welfare of May 30, 1996 on carrying out medical examinations of workers, to the extent of the preventive health care for workers, as well as on medical decisions issued to such ends provided for by the Labour Code,
  - Accounting Act of September 29, 1994.
- legitimate interest pursued by the Administrator, pursuant to art. 6 para. 1(f) of the "Regulation";

### **Voluntary nature or obligation to provide personal data?**

When the processing of personal data arises from an agreement concluded (Art. 6 para.1(b)), from the applicable provisions of law (Art. 6 para. 1(c)) or the Administrator's legitimate interest in connection with establishing, defending against and pursuing claims and responding to letters, complaints (Article 6 para. 1(f)), providing data is voluntary, but necessary for the conclusion and performance of an agreement. In the event of failure to provide the personal data we may refuse to conclude an agreement.

When the processing of personal data is based on the consent granted for a specific purpose, e.g. sending information to an e-mail provided, the provision of data is voluntary, same as the consent. One should also remember that you have the right to withdraw the consent granted at any moment. Withdrawal of consent does not affect the legality of processing of personal data which was made according to the consent granted before its withdrawal.

### **How long do we retain personal data?**

Period of retaining your personal data depends on the purpose for which the data is being processed. It is pursuant to legal provisions (which require to retain data for a specific period of time) or is necessary for the performance of an agreement or legitimate interests pursued by the Administrator or by a third party.

#### Examples of periods for which personal data may be retained:

- retention data (correspondence) - **12 months**;
- data processed on the basis of the provisions of law to the extent arising from keeping employee files - **50 years (for contracts concluded until December 31, 2018) / 10 years (for contracts concluded after January 1, 2019)**;

- data processed on the basis of the Accounting Act in the field of settlements with employees - **10 years**;
- data processed on the basis of the legitimate interest of the Administrator - **5 years**;
- data processed on the basis of a consent granted by a data subject - **until the consent is withdrawn or 12 months from the end of the purpose of its processing**.

## **Do we transfer personal data and to whom?**

Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant to a concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions,
  - fraud detection and prevention, and resolving other problems regarding fraud, security and technical issues,
  - protection of the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.

We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## **Do you have rights in connection with processing of your personal data?**

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;
- **right to obtain a copy of data** - on this basis, we will provide a copy of the processed data regarding your person;
- **right to correct data** - on this basis, you have the right to request that the processed data be corrected,
- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to limit processing** - on this basis, you can request to end operations on personal data - except of operations for which consent has been given - and its storage, as per the adopted retention principles or until the reasons for limiting data processing cease to exist (e.g. a decision of supervisory authority authorizing further data processing is issued);
- **right to transfer data** - on this basis - to the extent that the data is processed solely for the purpose of performing an agreement or on the basis of a consent given in an automated manner - one can request the release of stored personal data in a machine-readable format. It is also possible to request this data to be sent to another entity -

provided, however, that there are technical possibilities in this regard, both on the part of the Administrator and on the part of other entity;

- **right to raise an objection to other purposes of data processing** - on this basis one can raise an objection to processing of personal data at any moment, which is based on the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to marketing of own goods or services), the objection in this regard should contain grounds;
- **right to withdraw consent** - on this basis, only when personal data is processed on the basis of a consent given, the consent may be withdrawn at any moment, which, however, does not affect the legality of processing carried out before the consent was withdrawn;
- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## How can I exercise certain rights?

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you will find at [www.uodo.pl](http://www.uodo.pl)

## Is the data subject to automated processing?

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that has legal effects or significantly affects you.

## What personal data can we process?

- personal data (e.g. name and surname, position, data of spouse and children);
- personal data (e.g. education, experience, interests);
- employment data (e.g. date of an employment contract, date and reason of termination or cessation of an employment contract, value and mode of payment of remuneration, position held, number of working hours and place of work, awards, distinctions, penalties, leaves granted and records of absences and their causes, employee's health (period of illness, code of medical indications, letter code of a disease, degree and period of validity of disability certificate, data contained in a documentation of an accident at work, on the way to or from work, and medical indications resulting from occupational medicine examinations performed), courses and training to improve professional qualifications, data on seizures by a bailiff, address of the Tax Office and the NHF branch;
- contact details (e.g. mailing address, telephone number, e-mail address);
- identification data (e.g. NIP number, PESEL number);
- transactional data (e.g. data related to salaries, details of bank account);
- communication data (e.g. data originating from correspondence);
- contract data (e.g. data originating from signed contracts, agreements);

- data regarding legal connections (e.g. information necessary to implement instructions as per the power of attorney or authorization).

### **From where do we acquire personal data?**

We acquire personal data mainly from a data subject (that is, from you).



Information obligation in connection with the processing of personal data of job applicants by Cargotor Sp. z o.o.

### **Who is the Administrator of personal data?**



The administrator of personal data of job applicants is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13 The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 – 802 Warszawa ul. Lubelska 13 with the note: Personal Data Protection.

### **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

### **Purpose and legal grounds for personal data processing?**

Personal data is processed in connection with ongoing recruitment procedure or in the event of giving separate consent also in connection with future recruitment procedures and in connection with retaining necessary information in connection with defending against or pursuing claims arising from the selection made (legitimate interest of the Administrator).

We process personal data for the purposes of:

- selecting job candidate for a specific position, pursuant to art. 6 para. 1(A) and (c) of the Regulation;
- conducting analyses and statistics, pursuant to art. 6 para. 1(f) of the "Regulation";
- establishing, defending against and pursuing claims, pursuant to art. 6 para. 1(f) of the "Regulation";
- legitimate interest of the Administrator (e.g. as regards an image registered by the monitoring system installed in the Administrator's office), pursuant to art. 6 para. 1(f) of the "Regulation";
- responding to letters, requests and complaints, pursuant to art. 6 para. 1(f) of the "Regulation".

Data processing is based on:

- consent given, pursuant to art. 6 para. 1(a) of the "Regulation";
- legal obligation, pursuant to art. 6 para. 1(c.) of the "Regulation";
- legitimate interest pursued by the Administrator, pursuant to art. 6 para. 1(f) of the "Regulation";

## Voluntary nature or obligation to provide personal data?

When the processing of personal data arises from the applicable provisions of law (Article 6 (1) (c)), providing data is voluntary, but necessary for the processing of submitted application documents. In the event of failure to provide the indicated personal data, we have the right not to handle the application submitted in the recruitment process.

When the processing of personal data is based on the consent granted for a specific purpose, the provision of data is voluntary, same as the consent. One should also remember that you have the right to withdraw the consent granted at any moment. Withdrawal of consent does not affect the legality of processing of personal data which was made according to the consent granted before its withdrawal.

## How long do we process personal data?

- In the case of a recruitment process - they will be processed for a period **not longer than 6 months**, and if your consent to the processing of data for the purpose of future recruitments was granted **for a period of up to 24 months**;
- As regards an image - **we process for a period of up to 30 days**, subject to the extension of this period of their processing in the event of securing the recording for the purpose of preliminary investigation of an event recorded by video monitoring system, but only if the image has been registered by our monitoring system.

## Do we transfer personal data and to whom?

Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant to the concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions,
  - fraud detection and prevention, and resolving other problems regarding fraud, security and technical issues,
  - protect the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.

We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## Do you have rights in connection with processing of your personal data?

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;

- **right to obtain a copy of data** - on this basis, we will provide a copy of the processed data regarding your person;
- **right to correct data** - on this basis, you have the right to request that the processed data be corrected,
- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to limit processing** - on this basis, you can request to end operations on personal data - except of operations for which consent has been given - and its storage, as per the adopted retention principles or until the reasons for limiting data processing cease to exist (e.g. a decision of supervisory authority authorizing further data processing is issued);
- **right to transfer data** - on this basis - to the extent that the data is processed solely for the purpose of performing an agreement or on the basis of consent given in an automated manner - one can request the release of stored personal data in a machine-readable format. It is also possible to request this data to be sent to another entity - provided, however, that there are technical possibilities in this regard, both on the part of the Administrator and on the part of other entity;
- **right to raise an objection to other purposes of data processing** - on this basis one can raise an objection to processing of personal data at any moment, which is based on the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to marketing of own goods or services), the objection in this regard should contain grounds;
- **right to withdraw consent** - on this basis, only when personal data is processed on the basis of a consent given, the consent may be withdrawn at any moment, which, however, does not affect the legality of processing carried out before the consent was withdrawn;
- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## How can I exercise certain rights?

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you can find at [www.uodo.pl](http://www.uodo.pl).

## Is the data subject to automated processing?

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that has legal effects or significantly affects you.

## What personal data can we process?

We collect and process the following range of data:

- personal data (e.g. name and surname, date and place of birth);

- contact details (e.g. mailing address, telephone number, e-mail address);
- image data (e.g. photograph);
- communication data (e.g. data originating from correspondence);
- personal data (e.g. education, professional experience, skills, interests).

### **From where do we acquire personal data?**

We acquire personal data mainly from a data subject (that is, from you).



## Information obligation in connection with processing of personal data of Senders of e-mail correspondence not related or related to services provided or agreements concluded

### **Who is the Data Administrator?**

The administrator of the processed personal data of Senders of e-mail correspondence not related or related to services provided or agreements concluded is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13. The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 – 802 Warszawa ul. Lubelska 13 with the note: Personal Data Protection.

### **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

### **Purpose and legal grounds for personal data processing?**

Personal data is processed in connection with correspondence and the need of retaining necessary information in connection with defence against or pursuing claims arising from correspondence (legally justified interest of the Administrator).

We process personal data for the purposes of:

- responding to correspondence sent related to the performance of an agreement, pursuant to art. 6 para. 1(b), or in a situation not related to the performance of an agreement, art. 6 para. 1(a) and (f) of the "Regulation";
- establishing, defending against and pursuing claims, pursuant to art. 6 para. 1(f) of the "Regulation".

Data processing is based on:

- consent given, pursuant to art. 6 para. 1(a) of the "Regulation";
- agreement. art. 6 para. 1(b) of the "Regulation";
- legitimate interest pursued by the Administrator, pursuant to art. 6 para. 1(f) of the "Regulation";

## **Voluntary nature or obligation to provide personal data?**

When the processing of personal data is based on the consent granted for a specific purpose, the provision of data is voluntary, same as the consent. One should also remember that you have the right to withdraw a consent granted at any moment. Withdrawal of consent does not affect the legality of processing of personal data which was made according to the consent granted before its withdrawal.

When the processing is based on the basis of an agreement concluded, than providing of personal data is voluntarily, but necessary for the performance of an agreement. Failure to provide personal data may result in e.g. lack of response to question asked.

## **How long do we retain personal data?**

Examples of periods for which personal data may be retained:

- correspondence data (not related to an agreement) - **up to 12 months of the response;**
- correspondence data (related to an agreement) - **up to 24 months of the response;**

## **Do we transfer personal data and to whom?**

Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant a concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions,
  - fraud detection and prevention, and resolving other problems regarding fraud, security and technical ,
  - protect the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.

We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## **Do you have rights in connection with processing of your personal data?**

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;
- **right to obtain a copy of data** - on this basis, we will provide a copy of the processed data regarding your person;
- **right to correct data** - on this basis, you have the right to request that the processed data be corrected,

- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to limit processing** - on this basis, you can request to end operations on personal data - except of operations for which consent has been given - and its storage, as per the adopted retention principles or until the reasons for limiting data processing cease to exist (e.g. a decision of supervisory authority authorizing further data processing is issued);
- **right to transfer data** - on this basis - to the extent that the data is processed solely for the purpose of performing an agreement or on the basis of a consent given in an automated manner - one can request the release of stored personal data in a machine-readable format. It is also possible to request this data to be sent to another entity - provided, however, that there are technical possibilities in this regard, both on the part of the Administrator and on the part of the other entity;
- **right to raise an objection to other purposes of data processing** - on this basis one can raise an objection to processing of personal data at any moment, which is based on the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to marketing of own goods or services), the objection in this regard should contain grounds;
- **right to withdraw consent** - on this basis, only when personal data is processed on the basis of a consent given, the consent may be withdrawn at any moment, which, however, does not affect the legality of processing carried out before the consent was withdrawn;
- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## How can I exercise certain rights?

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you can find at [www.uodo.pl](http://www.uodo.pl).

## Is the data subject to automated processing?

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that has legal effects or significantly affects you.

## What personal data can we process?

- personal data (e.g. name and surname);
- contact details (e.g. mailing address, telephone number, e-mail address);
- image data (e.g. photograph);
- communication data (e.g. data originating from correspondence);
- vocational data(e.g. name of entity, address, position).

## From where do we acquire personal data?

We acquire personal data mainly from a data subject (that is, from you).



Information obligations towards Guests of Cargotor Sp. z o. o. in connection with processing of personal data by means of video monitoring

## **Who is the Data Administrator?**

The administrator of personal data of Guests in connection with processing of personal data by means of video monitoring is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13. The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with the note: Personal Data Protection.

## **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

## **Purpose and legal grounds for personal data processing?**

The purpose of personal data processing by video monitoring is to ensure the safety of persons (employees) and protection of property.

Data processing is based on the legitimate interest pursued by the Administrator, pursuant to art. 6 para. 1(f) of the "Regulation".

## **How long do we retain personal data?**

Personal data from video monitoring will be processed for a period of up to 10 days, subject to securing the recording constituting the evidence in the proceedings, until the cessation of the purpose of processing.

## **Do we transfer personal data and to whom?**

Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant to a concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions,
  - fraud detection and prevention, and resolving other problems regarding fraud, security and technical issues,
  - protect the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.



We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## **Do you have rights in connection with processing of your personal data?**

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;
- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to raise an objection to other purposes of data processing** - on this basis one can raise an objection to processing of personal data at any moment, which is carried out on the basis of the legitimate interest of the Administrator (e.g. for analytical or statistical purposes), the objection in this regard should contain grounds;
- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## **How can I exercise certain rights?**

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you can find at [www.uodo.pl](http://www.uodo.pl).

## **Is the data subject to automated processing?**

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that may have legal effects or significantly affect data subject.

## **What personal data can we process?**

We collect and process the following range of data:

- image of a person;
- physical features;
- vehicle make and registration number;
- time and place of an event covered with monitoring.

## **From where do we acquire personal data?**

We acquire personal data mainly from a data subject (that is, from you).



## Information obligation in connection with processing of personal data of participants of tenders organized by Cargotor Sp. z o.

### **Who is the Administrator of personal data?**

The administrator of personal data in connection with processing of personal data of participants in tenders is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13. The administrator can be contacted by e-mail by writing to the following e-mail address: [sekretariat@cargotor.com](mailto:sekretariat@cargotor.com) or in traditional form by sending correspondence to the address of Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with the note: Personal Data Protection.

### **Has the Data Protection Inspector been appointed?**

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: [iod@cargotor.com](mailto:iod@cargotor.com) or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

### **Purpose and legal grounds for personal data processing?**

Personal data is processed in connection with tender procedure aimed at selecting a contractor or provider of services, products and in connection with retaining necessary information as regards the defence against or pursuing claims arising from the contract award and responding to submitted letters and complaints (legitimate interest of the Administrator).

We process personal data for the purposes of:

- selecting a provider / contractor, pursuant to art. 6 para. 1(B) of the "Regulation";
- conducting analyses and statistics, pursuant to art. 6 para. 1(f) of the "Regulation";
- establishing, defending against and pursuing claims, pursuant to art. 6 para. 1(f) of the "Regulation";
- archiving data and documents, pursuant to art. 6 para. 1(f) of the "Regulation";
- responding to letters, requests and complaints, pursuant to art. 6 para. 1(b) and (f) of the "Regulation".

Data processing is based on:

- consent given, pursuant to art. 6 para. 1(a) of the "Regulation";
- agreement or to undertake actions before concluding an agreement, pursuant to art. 6 para. 1(b) of the "Regulation";

- legal obligation incumbent on the Administrator, arising in particular from the provisions of law, pursuant to art. 6 para. 1(c) of the "Regulation" e.g. when the tender procedure is held in connection with co-financing from EU programs;
- legitimate interest pursued by the Administrator or by a third party, pursuant to art. 6 para. 1(f) of the "Regulation";

## How long do we retain personal data?

Period of retaining your personal data depends on the purpose for which the data is being processed. It is pursuant to legal provisions (which require to retain data for a specific period of time) or is necessary for the performance of an agreement or legitimate interests pursued by the Administrator or by a third party.

Examples of periods for which personal data may be retained:

- retention data - **12 months**;
- analysis and statistics - **up to 10 years**;
- data regarding court judgments (abuses) - **10 years from the date of verdict**.

## Do we transfer personal data and to whom?

Personal data may only be transferred when:

- recipients include other entities providing services to Cargotor Sp. z o. o. only within the scope of service provided pursuant the concluded agreement,
- recipients include other entities as regards:
  - striving to meet the requirements of applicable law, regulations, litigations or valid demands of state institutions,
  - fraud detection and prevention, and resolving other problems regarding fraud, security and technical ,
  - protect the property rights or safety of the Personal Data Administrator and other persons in a way required or permitted by law.

We do not intend to transfer personal data to the so-called third countries (i.e. outside the European Economic Area including the European Union, Norway, Liechtenstein and Iceland). However, if the need arises, we can do it while ensuring an adequate level of protection and applying appropriate provisions of law.

## Do you have rights in connection with processing of your personal data?

Yes, each person whose personal data is being processed by the Administrator has the following rights:

- **right to information about the processing of personal data** - on this basis, we will provide information about the processing of data, in particular about the purpose and legal grounds for processing, the scope of data kept, entities to which it is disclosed and the scheduled date of data deletion;
- **right to delete data** (the right to be forgotten) - on this basis, you can request the deletion of data, processing of which is no longer necessary to pursue any of the purposes for which it was collected;
- **right to raise an objection to other purposes of data processing** - on this basis one

can raise an objection to processing of personal data at any moment, which is carried out on the basis of the legitimate interest of the Administrator (e.g. for analytical or statistical purposes), the objection in this regard should contain grounds;

- **right to lodge a complaint** - on this basis, if you are of the opinion that the processing of personal data infringes the provisions of the "Regulation" or other provisions regarding the protection of personal data, you can lodge a complaint with the President of the Office for Personal Data Protection.

## **How can I exercise certain rights?**

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at [www.cargotor.com](http://www.cargotor.com) you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you can find at [www.uodo.pl](http://www.uodo.pl).

## **Is the data subject to automated processing?**

No, currently we do not process data in an automated manner, and personal data is not subject to profiling that may have legal effects or significantly affect data subject.

## **What personal data can we process?**

We collect and process the following range of data:

- personal data as regards the representative representing an entity and/or its employee (e.g. name and surname, position);
- details on entity (e.g. name and address of an entity, data of a representative);
- contact details (e.g. mailing address, telephone number, e-mail address);
- identification data (e.g. NIP number, KRS number, REGON number);
- communication data (e.g. data originating from correspondence);
- contract data (e.g. data originating from the bids submitted);
- data regarding legal connections (e.g. information necessary to implement instructions as per the power of attorney or authorization);
- publicly available data (e.g. data from KRS, data from CEDIG).

## **From where do we acquire personal data?**

We acquire personal data mainly from a data subject (that is, from you). However, in justified cases, e.g. to confirm data or verify statements submitted, we may acquire data from:

- Register of Entrepreneurs of the National Court Register;
- Central Register of Economic Activity;

or the Entity, where you are employed and you were appointed by an Entity to represent it in the proceedings.