

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE CONTRACTORS OF KLK TRADE SP. Z O.O.

1. Personal scope.

This information on the processing of personal data concerns the processing of personal data of the following natural persons:

- 1) contractors (including suppliers) of KLK Trade Sp. z o.o. and their sub-contractors.
- 2) authority members, employees, co-operators, agents, representatives, people indicated in contracts as their coordinators or people authorised to contact within their performance, and contractors' partners (including suppliers) of KLK Trade Sp. z o.o. and their sub-contractors.
- 3) other persons which personal data is processed by KLK Trade Sp. z o.o. within the framework of the cooperation with contractors (including suppliers) of KLK Trade Sp. z o.o. and their sub-contractors

(hereinafter referred to as: Contractors or You).

2. Personal data controller.

Your personal data controller is KLK Trade Sp. z o.o. seated in Warszawa (00-412), ul. Kruczkowskiego 4/13 (hereinafter referred to as: Controller). You can contact the Controller by correspondence to the address of the head office or by email at odo@klk-trade.com.

3. Purposes and legal basis for the processing of personal data and data retention period.

Lp.	Cel	Podstawa prawna	Okres przechowywania
1.	Conclusion and performance of a contract (including order fulfilments), if you are a Party there to	Article 6 1 (b) of the GDPR	To the termination of the contract (order fulfilment), unless the retention results from other legal bases
2.	Fulfilment of legal obligations of the Controller (e.g. invoicing, record keeping)	Article 6 (1) (c) of the GDPR	To the end of terms stipulated in regulations (e.g. in general, tax records should be kept for 5 years, counting from the end of the calendar year in which the deadline for tax payment expired)
3.	Legally justified interest of the Controller consisting in: <ul style="list-style-type: none"> – monitoring the status of contract performance; – establishing and maintaining business relations; – performance of business processes (including management analyses, prognoses, planning, transactions, business continuity); – building a contractor database; – establishing, ascertaining and defending against claims; – verification of payment credibility; – verification in public registers; – fulfilment of obligations stipulated in project funding agreements; – marketing of own products or services; – organisation of trainings and conferences. 	Article 6 (1) (f) of the GDPR	To the realisation or termination of the interest (e.g. To the prescription of potential claims resulting from the employment relationship) or effective objection against the retention

4. Personal data categories.

As the Controller, we will process the following categories of personal data:

- identifying data, e.g. name(s) and surname, PESEL number, TIN, REGON, business address, position/function;
- contact data, e.g. correspondence address, email, phone number, mobile phone number, fax;

- financial data, e.g. bank account number;
- professional experience and qualifications.

5. Personal data recipients.

The Controller can transfer you personal data within a required scope, especially to the following categories of recipients:

- 1) entities rendering services to the Controller, especially:
 - entities maintaining and making accessible to the Controller of IT systems and tools, where personal data is processed;
 - external legal support, financial and tax consulting;
 - external financial and accounting services;
 - debt recovery, auditing, consulting, factoring companies;
 - insurance companies and banks;
 - entities rendering services of the analysis of financial reports;
 - entities rendering logistic services (storage, shipping, transport of goods);
 - entities rendering external services of the protection of property;
 - entities rendering postal and courier services;
 - marketing agencies;
 - conference centres, hotels (for the organisation of conferences);
- 2) institutions entitled by law to receive personal data of Contractors based on applicable regulations (e.g. Tax Office, courts and other authorities, including bailiffs and police);
- 3) institutions entitled by law to control the Controller;
- 4) institutions with which the Controller concludes project funding agreements and controlling the performance of these agreements.

Entities processing personal data use proper safety tools by using suitable technical and organisational means ensuring an adequate level of safety for the risk related to the processing of personal data, according to the GDPR, as well as common regulations in force. Entities processing data are obliged to keep the data in secret.

6. Transfer of personal data to third countries.

The Controller can transfer you personal data to third countries (i.e. other countries than the member states of the EU, Norway, Lichtenstein or Iceland). In relation to sharing for some countries (e.g. Switzerland), the European Commission ascertained the adequate level of protection, for others (e.g. Ukraine) — adequate level of protection is not ascertained. In the case of transferring of personal data to third parties, for which the adequate level of protection is not ascertained by the Commission, the data will be adequately secured, in particular by using special contractual clauses, and enforceable rights as well as effective means of legal defence will be in place. If the aforementioned is not possible, your data will be transferred only if it is necessary for legally justified interests of the Controller. We hereby inform you that you are entitled for receiving a copy of your personal data transferred to a third party or receiving information of the place where the data has been shared.

7. Rights of data subjects.

Pursuant to the GDPR, you are entitled to demand the access to your personal data from the Controller, correct, delete or restrict the processing of your personal data, to object to the processing of your data based on a justified interest of the Controller and you have the right of data portability.

To exercise your rights, you can contact the Controller at the address given in Clause 2.

You have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office, address: 2 Stawki Street, 00-193 Warsaw.

8. Obligation or voluntariness of giving data.

If you conclude a contract directly with the Company, Some data is required by law or necessary for the performance of the contract. Refusal to give the data will make the conclusion of the contract impossible or the contract will have to be terminated. Giving other data is voluntary, however their lack can result in a failure to perform activities for which this data is required by the Controller; apart from that, no other consequences will be caused.

If you do not conclude the contract directly with the Controller, giving your personal data can be your work duty

or can be necessary to conclude the contract between you and a third party (e.g. if you are a sub-contractor of a Contractor).

9. Data source.

Your data has been acquired:

- 1) directly from you;
- 2) from public sources, e.g. the Register of Entrepreneurs of the National Court Register (KRS), Central Registration and Information of Business (CEIDG), Central Statistical Office (GUS), websites, public profiles in social media;
- 3) from entities in which you are authority members, employees, co-operators, agents, representatives, people indicated in contracts as their coordinators or people authorised to contact within their performance, and contractors' partners;
- 4) from the main contractors — if you are the sub-contractors pursuant to contracts with the Controller.

10. Updating Information on the processing of personal data.

This Information on the processing of personal data is effective from August 01, 2022 and was updated on June 14, 2024 and may be subject to further changes.