



## PRIVACY POLICY

### SKP Ślusarek Kubiak Pieczyk spółka komandytowa

#### INFORMATION ON THE PROCESSING OF PERSONAL DATA

##### 1. GENERAL INFORMATION

- 1.1. The administrator of personal data within the meaning of data protection regulations is: SKP Ślusarek Kubiak Pieczyk spółka komandytowa, with its registered office in Warsaw (00-546), ks. I. J. Skorupki Street, No. 5, entered in the register of entrepreneurs kept by the District Court for the City of Warsaw, XIII Economic Department of the National Court Register under KRS number 0000961110, NIP 5213960502, REGON number 521518831 (hereinafter: the "**Administrator**" or the "**SKP**").
- 1.2. Whenever this Policy refers to "personal data", it shall mean information about an identified or directly or indirectly identifiable individual, in particular on the basis of an identifier such as a name, an identification number, location data, an online identifier or one or more specific factors determining the physical, physiological, genetic, mental, economic, cultural or social identity of an individual.
- 1.3. The Administrator shall process personal data in accordance with applicable laws, in particular with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter "**GDPR**".
- 1.4. This Privacy Policy (hereinafter referred to as the "**Policy**") defines the purposes, principles and manner of processing personal data of: the SKP's customers, contractors and suppliers (their representatives and personnel), applicants for employment or cooperation with the SKP, persons using the SKP's websites, persons subscribing to the SKP's



Newsletter or using the SKP's news service notifications (blogs), persons contacting the SKP and visitors to the SKP's social media sites.

1.5. This Policy fulfills the information obligation under Article 13 and Article 14 of the GDPR.

## 2. CONTACT WITH THE ADMINISTRATOR

2.1. All requests, questions and demands related to the SKP's processing of personal data may be addressed:

- by mail to the Administrator's registered address,
- in electronic form to the e-mail address: [dane@skplaw.pl](mailto:dane@skplaw.pl).

2.2. The Administrator shall respond to submitted questions, requests or demands immediately, no later than within 14 days.

2.3. Responses shall be provided in the form as the questions, requests or demands submitted, unless the submitter requests a response in another form, such as written.

2.4. If the SKP is unable to identify an individual on the basis of a submitted request, application or directed questions, it shall ask the individual for additional information that shall be necessary to fulfill the request or answer the question or application.

## 3. RIGHTS OF DATA SUBJECTS

3.1. Anyone whose Personal Data we process shall have the right to:

- a) to obtain information about the processing of Personal Data, including the categories of Personal Data processed and possible recipients of the data;
- b) request the correction of inaccurate personal data or the completion of personal data,
- c) request the erasure or restriction of the processing of personal data - whereby the request shall be fulfilled if the legal requirements for such a request are met;
- d) to object to the processing of personal data, where the legal requirements for such a request are met;



- e) transfer of personal data - by receiving personal data from the Administrator in a format that allows its transfer to a third party of your choice;

3.2. If personal data is considered to be processed in violation of the law, anyone has the right to file a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw, [www.uodo.gov.pl](http://www.uodo.gov.pl).

#### 4. CATEGORIES OF PERSONAL DATA

##### [PERSONAL DATA OF THE SKP'S CLIENTS]

- 4.1. The Administrator shall process personal data of its clients who are individuals in connection with legal assistance and other services provided by the Administrator.
- 4.2. Personal data processed for the purpose of reliable and due performance of professional activities in the entrusted case may include:
  - a) name, surname, place of work, official position, contact information (mailing address, telephone number, email address, social media accounts);
  - b) any other data made available in connection with the provision of legal assistance, including special category data within the meaning of the GDPR, which we are obliged to protect in accordance with the professional secrecy of the attorney/legal advisor in force.
- 4.3. The legal basis for the processing of personal data is Article 6(1)(b) of the GDPR, i.e. performing actions for the purpose of entering into a contract or performing a concluded contract for the provision of legal assistance services, Article 6(1)(f) of the GDPR - in terms of asserting or defending against contractual claims, and Article 9(2)(f) of the GDPR - i.e. the processing is necessary to establish, assert or defend your claims related to our provision of legal assistance to you.
- 4.4. Personal data shall be processed until the definitive termination of cooperation with the SKP, as well as for the period of limitation of claims arising from the cooperation.

##### [PERSONAL DATA OF THE SKP'S BUSINESS PARTNERS]



- 4.5. The Administrator processes personal data of its contractors, partners and suppliers who are individuals in connection with cooperation or for the purpose of establishing cooperation with the SKP. The data is also processed for the purpose of contacting them on ongoing matters, including the execution of contracts between us, providing offers, receiving orders, answering questions.
- 4.6. Personal data includes: name, surname, PESEL number, Tax Identification Number, address data such as place of business, place of work, official position, contact data (mailing address, telephone number, email address).
- 4.7. The legal basis for personal data processing is: Article 6(1)(b) and (c) of the GDPR - processing is necessary for the performance of the concluded agreement and fulfillment of the Administrator's legal obligations, and Article 6(1)(f) of the GDPR - i.e. the Administrator's legitimate legal interest in pursuing contractual and/or related claims.
- 4.8. Personal data shall be processed until the termination of cooperation, and after the termination of cooperation also for the period necessary to comply with legal obligations (e.g. under tax regulations) and for the period of limitation of claims arising from or related to the contract between us and you.

#### **[DATA OF REPRESENTATIVES (PERSONNEL) OF CUSTOMERS AND CONTRACTORS]**

- 4.9. In connection with the establishment of cooperation, negotiation and conclusion of contracts, the SKP processes personal data of representatives and personnel (who are individuals) of clients and contractors. These are persons, in particular, employees and associates designated for contact or contract execution.
- 4.10. Personal data shall be processed for the purpose of contact in current matters, including conclusion and execution of contracts, presentation of offers, receiving orders, answering questions.
- 4.11. Personal data shall include: name, surname, place of work, official position, contact information (mailing address, telephone number, email address, accounts on social networks).



- 4.12. The legal basis for personal data processing is the legitimate interest of the Administrator (Article 6(1)(f) GDPR), consisting of the ability to establish and continue cooperation or contact with you, the ability to defend against claims or assert claims.
- 4.13. Personal data shall be processed until the termination of cooperation with the SKP, as well as for the period of the statute of limitations for contractual claims. Personal data may be deleted at an earlier date - in the event of obtaining objections to the processing, as well as in the event that we consider that the data are no longer necessary for us to achieve our legitimate purpose. Personal data shall be processed for a longer period of time if their retention is required by applicable law or is necessary to make settlements or assert claims as part of your activities as our contractor

#### [PARTICIPANTS IN THE SKP EVENTS]

- 4.14. Personal data of participants of events organized by the SKP (including in the form of online) shall be processed for the purpose of registration for the event, participation in the event, as well as contact in regard to the events (sending information and materials, notifications about future events).
- 4.15. In connection with the organization of events, the SKP shall process the following personal data: name, surname, place of work, official position, contact information (mailing address, telephone number, email address).
- 4.16. The legal basis for data processing is the legitimate interest of the Administrator in organizing the event, including ensuring the participation of participants, i.e. Article 6(1)(f) of the GDPR, and in the case of paid training courses and conferences - Article 6(1)(b) and (c) of the GDPR.
- 4.17. Personal data shall be added to the SKP's contact database. If you object to the processing of your personal data within our contact database, your data shall be deleted within 1 month after the event.

#### [NEWSLETTER AND BLOG SUBSCRIBERS]



- 4.18. The SKP shall process the personal data of individuals who subscribe to the free Newsletter or news services within the thematic blogs maintained by the SKP.
- 4.19. Personal data is processed for the purpose of delivering the free Newsletter and free notifications of posts and articles on the SKP thematic blogs. Only the email address and IP address of your computer shall be processed for this purpose.
- 4.20. The legal basis for personal data processing is Article 6(1)(b) of the GDPR, i.e. performance by the Administrator of the agreement to deliver the ordered Newsletter and notifications from thematic blogs.
- 4.21. Personal data shall be stored for the period of delivery of the Newsletter and notifications from thematic blogs. In case of cancellation of the service, personal data shall be deleted immediately.

#### [DATA OF CANDIDATES FOR EMPLOYMENT AND COOPERATION WITH THE SKP]

- 4.22. In connection with the ongoing recruitment of candidates for employment or cooperation, the SKP shall process the personal data provided by the Candidate in order to assess the qualifications for the applied position, to select a suitable person, i.e. in order to perform activities aimed at concluding an employment contract for a given position or undertaking cooperation.
- 4.23. With the separate consent of the Candidate, we shall process the personal data provided for the purposes of future recruitment processes at the SKP.
- 4.24. As part of the recruitment processes, the SKP shall process the following personal data of the candidates indicated in their CVs or otherwise: first and last name; parents' names, date of birth; place of residence; education; history of previous employment. In the case of job applicants under an employment contract, when applications shall contain data beyond those specified in the labor law, such data shall be processed on the basis of the candidate's consent, expressed by sending application documents (CV, e-mail, resume, application) to the SKP.





- 4.25. The legal basis for personal data processing shall be (1) Article 6(1)(c) of the GDPR, in conjunction with Article 221 § 1 of the Labor Code, with regard to the processing of personal data within the scope of the employment relationship; (2) Article 6(1)(b) and (c) of the GDPR, with regard to the processing of personal data within the scope of a civil law contract; (3) Article 6(1)(a) of the a of the GDPR, regarding the processing of personal data for possible future recruitments, in the case of image processing, in the case of the transfer of data other than those specified in the labor laws; and (4) Article 6(1)(f) of the GDPR, regarding data collected for the purpose of evaluating a candidate and for the purpose of establishing or asserting possible claims.
- 4.26. The SKP shall process the candidate's personal data until the recruitment is completed, and in the case of separate consent to process the data for future recruitment, we shall keep the data for a period of 3 years from the date of collection.

#### [INDIVIDUALS WHO CONTACT THE SKP (VIA PHONE OR EMAIL)]

- 4.27. The SKP shall process personal data of those who contact the SKP by mail, email, forms on the website and telephone on any matter or the SKP contacts you on any matter and therefore the personal data is in the SKP contact database.
- 4.28. The SKP shall process personal data for the purpose of contacting you on current matters, including answering questions and making inquiries, as well as for possible cooperation.
- 4.29. The following personal data shall be processed for the above purpose: first name, last name, place of work, official position, contact data (mailing address, telephone number, email address, social media accounts) and other data provided in correspondence or communicated by telephone.
- 4.30. The legal basis for personal data processing is the Administrator's legitimate interest in answering your questions and establishing and maintaining relationships in the course of its business - Article 6(1)(f) GDPR.



4.31. Personal data shall be processed for the duration of the business relationship and for a period of one year after the termination of the relationship. Personal data may be deleted at an earlier date - in the event of an objection to the processing, as well as in the event that the SKP deems that the data are no longer necessary to achieve the legitimate purpose.

**[DATA COLLECTED AS PART OF PROFILES ADMINISTERED ON SOCIAL NETWORK SITES].**

4.32. The Administrator shall process personal data of visitors and those observing and commenting on official profiles of the SKP within Facebook and LinkedIn.

4.33. The rules of observing, posting and deleting comments, conducting correspondence - are defined by separate regulations of Facebook and LinkedIn, which are the administrators of personal data within the scope of the service.

4.34. Personal data obtained through the SKP profiles on social networking sites are processed in order to contact the recipients of the content presented on the sites, to enable the contact of interested persons with the SKP, to present activities and events related to the SKP brand, to develop the SKP brand and also for statistical purposes using the tools provided by Facebook and LinkedIn. Through social networks, you can also make contact with the Administrator and send a message, for example, with a question or request. In this case, the data shall also be processed for the purpose of responding.

4.35. Within and with the use of profiles on social networks, the SKP shall process data that shall be made available to the Administrator through the website's functionalities. Provision of personal data is voluntary.

4.36. The legal basis for data processing is Article 6(1)(f) of the GDPR, i.e. the Administrator's legitimate interest in being able to present the SKP brand, activities and answer any questions.

4.37. The retention period of the personal data, as well as the possibility of its eventual deletion, is based on the features of the various functionalities of the social networks (Face-





book and LinkedIn). Whenever deletion is requested, the SKP shall delete the data if possible and provided that we are not obliged by law to process the data further. Personal data shall also be deleted when it is no longer needed to fulfill the above-mentioned legitimate interests of the Administrator

## 5. RECIPIENTS OF PERSONAL DATA

- 5.1. Personal data may be shared with entities that provide services to the SKP (including external IT, courier, human resources, accounting, contractor services).
- 5.2. Personal data may also be made available to the SKP's subcontractors performing services for the SKP's clients (experts, appraisers, translators, law firms cooperating with the SKP).
- 5.3. Personal data may also be provided to other interested parties (independent of the SKP) if they are provided in a form from which it is clear that the data provider requests to be contacted by third parties on business matters.

## 6. FINAL PROVISIONS

- 6.1. This Policy shall enter into force on July 1, 2022.
- 6.2. In the event of a change in the principles of processing, the scope of the Administrator's processing of personal data, or a change in personal data protection regulations, the Administrator shall update and adapt the provisions of this Policy on an ongoing basis.