Privacy policy

The purpose of this privacy policy (hereinafter referred to as the **Policy**) is to define the terms and conditions for the processing of personal data from natural persons (hereinafter referred to as the **User** or **you**) who are users of our website. The policy also contains information regarding the rights of individuals with regard to the processing of their personal data.

Personal data administrator

The administrator of personal data is **PMICOMBERA Sp. z o.o.** Wiertnicza 39A, 02-952 Warsaw, entered into the register of entrepreneurs kept by the District Court for the m.st. of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under KRS number 0000050276, NIP 9520013172, REGON 010982840 (hereinafter referred to as **the Administrator** or **we**). Please be advised that we have appointed a Data Protection Officer. You can contact us, and above all our Data Protection Officer, via the website <u>www.pmi.pl</u> in the "Contact" tab or by post to our address.

We process your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation; OJ L.2016.119.1; hereinafter GDPR).

Using your account on our website

If you have created an account or intend to create one, we process the data provided by you in connection with the creation of an account and provided in the course of using it, including in connection with the registration of your participation in events. This data has been obtained directly from you.

We process your data for the following purposes and based on the following legal bases:

- 1. in order to conclude and perform the use of the account, i.e. to provide electronic services and enable the use of functionalities provided for in the user account (Article 6 (1) (b) of the GDPR),
- 2. implementation of the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR), consisting in the implementation of the legitimate interest of PMIComber (Article 6 (1) (f) of the GDPR), consisting in conducting analyzes and statistics on the use of the account, ensuring account security, as well as possible determination, investigation and defense against claims.

Providing data is voluntary, but it is necessary to set up an account and use its functionality, and failure to do so will result in the inability to conclude and perform the contract for the use of the account.

Personal data collected as part of the account will be stored for the duration of the contract for the use of the account. In the event of deletion of the account, personal data related to them will be deleted immediately, except for the data necessary to handle possible claims – these data will be stored until the expiry of the limitation periods for claims.

Exercise of your rights under the GDPR

We process the data provided by you in order to consider your request, as well as the data we have, necessary to process it.

We process your data for the following purposes and based on the following legal bases:

- 1. consider the notification regarding personal data, in accordance with the legal obligation incumbent on the Administrator (Article 6 (1) (c) of the GDPR), resulting from the provisions of the GDPR, including verification of your identity,
- 2. implementation of the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR), consisting in establishing, investigating and defending against claims, as well as handling possible administrative proceedings related to the exercise of the rights of data subjects.

Providing data is necessary to consider your application, and failure to provide them will result in the inability to consider it.

The data is stored until the expiry of the limitation period for claims of data subjects resulting from the exercise of their rights under Articles 12-22 of the GDPR (i.e. the period of limitation of claims for infringement of personal rights), as well as for the period necessary to handle possible administrative proceedings related to the exercise of the rights of data subjects.

Contact with the Administrator

If you contact us (e.g. via the option available on the website), the data we process about you are contact details and data resulting from your message. We have obtained this data directly from you.

Your personal data is processed in order to pursue a legitimate interest (Article 6 (Article 6 (disambiguation) of the European Union). 1(1)(a) f GDPR), consisting in ensuring that your message is handled and possibly answered the resulting questions.

Providing personal data is voluntary, but we need it to deal with your message. Refusal to provide personal data will result in the inability to handle the message sent by you and thus its removal.

The data is stored for the time necessary to handle the message sent to us.

Your rights under the GDPR

You have the right to:

- request access to your personal data, rectification, deletion or limitation of processing, as well as the right to transfer data,
- if the basis for the processing of personal data is our legitimate interest the right to object at any time to the processing of personal data for reasons related to your particular situation,
- if the basis for the processing of personal data is our legitimate interest in direct marketing the right to object at any time to the processing of personal data for the purposes of marketing activities.

If you have consented to the processing of personal data or to receive information from us (e.g. commercial information), you also have the right to withdraw your consents without affecting the lawfulness of the processing or sending of information made on the basis of consent before its withdrawal. If we intend to process your data based on consent, we will inform you in advance and take steps to provide you with the opportunity to give your consent; Expressing consent is always voluntary, and there are no negative consequences associated with not giving it.

In order to exercise your rights, please fill out the form on the website in the "Contact" tab.

I want to take advantage of the rights that the GDPR gives me

You also have the right to lodge a complaint with the supervisory body – the President of the Office for Personal Data Protection, Stawki 2, 00-193 Warsaw.

Recipients of personal data

The data may be transferred to recipients, in particular:

- entities providing services to us to the extent necessary to achieve the purposes described above, e.g. accounting services, companies providing IT and technical support services, legal and tax advice, banking, financial and insurance services, postal and telecommunications operators, document destruction and archiving services, marketing services, security andprotection, printers, translators, verification of compliance (audits), whereby these entities will have access to data only to perform their duties and to the extent necessary,
- other administrators, when it is necessary to achieve the purposes described above and to the
 extent necessary for this, including entities conducting events for the presentation of products
 and solutions (the so-called Big Red Tour and Milwaukee Tour), organized as part of the
 Program described in the Regulations of the account service on the website, companies
 related to us,
- law enforcement and state authorities, when it results from applicable law, including tax offices in connection with the implementation of tasks related to tax liabilities.

Personal data may be transferred by us to entities affiliated with us based outside the European Economic Area (EEA), i.e. to the United Kingdom being the headquarters of the ASL Group, where the transfer is necessary to achieve the purposes of personal data processing indicated in the Policy. The transfer of personal data outside the EEA takes place with the assurance of an adequate level of data protection required by the provisions of the GDPR, primarily by establishing cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission stating an adequate level of protection has been issued.

Use of personal data to make automated decisions, including profiling

Your personal data will not be used to make automated decisions, including profiling.

Cookies

The website uses cookies, which are text files that are stored on your end device (e.g. phone, tablet, computer) and are intended for using our website. Cookies do not cause configuration changes in the device or software installed on your device.

Cookies do not allow us to access your device with which you use the website or information about you, except for information about how you use our website and data that you choose to share with us (including personal data that you provide to us automatically due to your browser settings).

Managing cookie settings

A message will usually be displayed on our website before cookies are stored on your device. You can manage your cookie settings using your browser (which will allow you to disable the acceptance of all or some cookies). Your browser may request confirmation of changing the settings. Please note,

however, that enabling the blocking of all cookies may result in the inability to access some parts of our website.

In the links below you will find information from the most popular web browsers on how to manage cookies yourself while browsing the website:

- <u>Chrome</u>
- <u>Microsoft Edge</u>
- <u>Firefox</u>
- <u>Opera</u>
- <u>Safari</u>

You can verify the status of the current privacy settings for the web browser you are using at any time, e.g. using the following links: <u>http://www.aboutads.info/choices, http://www.youronlinechoices.eu/</u>.

Safety

We protect your personal data against unlawful disclosure to unauthorized persons, taking over data by unauthorized persons, destruction, loss, damage or alteration and processing of personal data in a manner inconsistent with the provisions of the GDPR.

In order to secure data, we use technical and organizational measures that meet the requirements of the GDPR, in particular the measures listed in Article 24 and Article 32 of the GDPR, ensuring confidentiality, integrity and availability of the services for processing the personal data provided.

Our affiliates, trusted partners and third-party service providers have committed to process your data in accordance with our security and privacy requirements.

Policy Changes

We are reviewing the Policy on a regular basis and reserve the right to make changes to it. If you see that the content of the Policy needs to be updated, please let us know.

Policy last updated: 20.05.2024