

## INFORMATION CLAUSE

1. Any and all personal data, and in particular the personal data of Participants, shall be processed in accordance with the legal provisions in force in the field of personal data protection, in particular 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) ("GDPR").

2. With regard to personal data collected during the Program and processed for the purposes and to the extent necessary to organize the Program, as well as with regard to personal data in the form of image and voice recorded on photos and videos made during the Trip constituting a Prize in the Program, the controller of personal data is Techtronic Industries Eastern Europe Sp. z o.o. with its registered office at ul. Komitet Obrony Robotników no. 45A, 02-146 Warsaw, entered in the Register of Businesses maintained by the Court for the Capital City of Warsaw, 13th Commercial Department of the National Court Register under KRS number 215064, NIP [tax ID]: 534-22-72-218.

3. The data is processed on the following basis:

a) in connection with the processing of the data within the aforementioned scope and purpose, "PMICOMBERA" sp. z o.o. with its registered office in Warsaw 02-952 at ul. Wiertnicza 39A, entered in the Register of Businesses maintained by the District Court for the Capital City of Warsaw, 13th Commercial Department of the National Court Register under KRS number 0000050276, NIP [tax ID]: 952-00-13-172, share capital of PLN 104. 000.00 is the entity processing the personal data (Processor) under the entrustment agreement concluded with TTI; the Participant's personal data may also be transferred to other entities for the purpose of the Program and to the extent necessary for this purpose (including hosting providers, suppliers of IT and short text message systems, Event Company organizing the Trip).

b) personal data is processed on the basis of the controller's legitimate interests, in order to carry out and organize the Program, including the issuance and redemption of the Prizes and to obtain Participants' opinions on their participation in the Program by means of surveys (on the basis of Article 6(1)(f) of the GDPR);

c) The Participant has the following rights in relation to the processing of their personal data: the right to access the data, the right to request rectification, restriction of processing or the right to erasure, as well as the right to object to the processing and to lodge a complaint with the supervisory authority which is also the leading supervisory authority for the above-mentioned purpose of processing (in Poland it is the President of the Office for Personal Data Protection);

d) the above entitlements can be exercised by the Participant by sending their request via the online contact form relating to Privacy Policy (onetrust.com), with the exception of a complaint with the supervisory authority which must be addressed directly to the President of the Office for Personal Data Protection;

e) the data shall be processed for the duration of the Program; with regard to the surveys conducted, personal data shall be stored until the Controller's legitimate interests are fulfilled;

f) providing personal data is voluntary but necessary to participate in the Program. Failure to provide data shall result in not being able to participate in the Program;

g) the recipients of the personal data may be the Controller's subcontractors who need to access the data to perform their duties;

h) the personal data of the winners of the Prizes, in connection with winning shall also be transferred to the Event Company organizing the Trip constituting the Prize in the Program, for the purpose of redeeming the Prize;

i) personal data shall not be subject to automated decision-making or profiling;

j) in connection with the redemptions of the Prize (trip to the United States) by the Event Company, personal data may be transferred to entities located in countries outside the European Economic Area, in particular in the United States, in particular carriers, hotel companies, as well as other entities providing related services with the Trip; in such cases, steps necessary to protect data are taken in accordance with the requirements of applicable law; for example, the foreign recipient may be required to comply with certain contractual terms, such as the European Commission's Standard Contractual Clauses.

4. At the same time, irrespective of the above, in order to implement the Account service, in the scope of complaint proceedings connected with the Program and in the scope necessary to pursue or defend against possible claims resulting from the Program as well as in order to fulfill tax obligations, the controller of the personal data of the Participants is the Organizer, i.e.

"PMICOMBERA" sp. z o.o., ul. Wiertnicza 39A, 02-952 Warsaw which processes personal data according to the principles described below. The Organizer can be contacted via the website [www.pmi.pl](http://www.pmi.pl) under the "Kontakt" [Contact] tab or by letter to the Organizer's registered office address. "PMICOMBERA" sp. z o.o. has appointed a Data Protection Inspector who can be contacted via the website [www.pmi.pl](http://www.pmi.pl) under the "Kontakt" [Contact] tab.

a) The Organizer, as the controller of the personal data, processes the data for the following purposes and on the following legal bases:

a. For the purpose of concluding and performing the agreement on the provision of the Account service which is an electronically provided service and enabling the use of the related functionalities (Article 6(1)(b) of the GDPR),

b. For the purpose of pursuing their legitimate interest (Article 6(1)(f) of the GDPR) which is processing of possible complaints, as well as exercising or defending of the Organizer's claims;

c. For the purpose of complying with the Organizer's statutory obligations regarding tax settlements (Article 6(1)(c) of the GDPR),

b) personal data relating to the Account service shall be processed for the period of use of the Account, except for the data necessary for handling of possible claims – the data shall be kept until the expiry of the periods of limitation of claims. Other personal data shall be processed until the statute of limitations on claims, i.e. for a period of 6 years from the date of issuance of the Prize or termination of participation in the Program (whichever event occurs later);

c) The Participant has the following rights in relation to the processing of their personal data: the right to access the data, the right to request rectification, restriction of processing, data portability or the right to erasure, as well as the right to object to the processing and to lodge a complaint with the supervisory authority which is also the leading supervisory authority for the above-mentioned purpose of processing (in Poland it is the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw); the Participant may exercise these rights by sending their request through the website [www.pmi.pl](http://www.pmi.pl) in the "Kontakt" ("Contact") tab. In case of an intent to lodge a complaint with a supervisory authority, it should be addressed directly to the President of the Office for Personal Data Protection at the mailing address specified above;

d) recipients of personal data may be subcontractors of the Organizer, in particular in the provision of outsourced IT services (email support and hosting, equipment maintenance, etc.), as well as entities providing consulting and legal services;

e) providing personal data is voluntary but necessary to participate in the Program. Failure to provide data shall result in not being able to participate in the Program;

f) personal data shall not be subject to automated decision-making or profiling;

g) The Organizer may transfer personal data to related entities based outside the European Economic Area (EEA), i.e. the United Kingdom which is the headquarters of Advantage Smollan Limited. The transfer of personal data outside the EEA shall be carried out ensuring an adequate level of data protection, as required by the provisions of the GDPR, primarily through cooperation with processors of personal data in countries for which a relevant decision of the European Commission stating an adequate level of protection has been issued.