

GDPR information on the processing of personal data contained in electronic correspondence**1. DATA CONTROLLER**

European Commercial (EC) Investment Poland Sp. z o.o. with its registered office in Warsaw (02-672), ul. Domaniewska 37, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, XIII Commercial Division of the National Court Register, KRS number 0000216769, Tax ID: 5213304695, REGON: 015819168 is the controller of the data of addressees and senders of electronic messages.

You can contact us:

1) at the correspondence address: European Commercial (EC) Investment Poland Sp. z o.o., address: ul. Domaniewska 37, 02-672 Warsaw;

2) at the electronic address: b.szewczuk@ecipoland.com.pl

2. PURPOSES AND DURATION OF PERSONAL DATA PROCESSING

1. We process contact information about senders and addressees of e-mail correspondence contained therein, in order to:

- 1) enable e-mail contact with us and contact with recipients;
- 2) documenting arrangements made with clients, contractors, other persons;
- 3) accept letters, notifications and applications in electronic form;
- 4) protect us against claims and pursuit of possible claims.

2. We store correspondence as long as it's useful for our contacts. If we terminate any cooperation or simply do not undertake it, the data will be stored by us for another 3 years, and then we decide on the need of its deletion, unless the messages contain essence relevant for pursuing claims or defending against them, then we will store the messages until the expiry of the limitation period for claims in accordance with the Polish Civil Code.

3. LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

The legal basis for the processing of data contained in e-mail correspondence is:

- 1) legitimate interest of the controller and senders of electronic messages (Art. 6(1)(f) of GDPR) – in terms of incidental correspondence, enabling electronic contact with the controller;
- 2) necessity to perform a contract with our customers or contractors (Art. 6(1)(b) of GDPR) in terms of correspondence conducted in order to perform the contract;
- 3) voluntarily expressed consent – if the correspondence sent contains data of special categories. If the sender has not included consent in his/her correspondence, we will ask for a separate consent, as this is a prerequisite for our processing of special categories of data in accordance with GDPR. You may withdraw your consent at any time, without giving any reason, but without affecting the lawfulness of its processing before its withdrawal;
- 4) voluntarily expressed consent through a clear affirmative action – if the sender of the message asks for information regarding products or services offered by the controller, the answer given to the sender will contain the information requested by the sender, and sending the inquiry will mean consent for the controller to send the sender commercial information to the e-mail address provided by the sender to the extent necessary to respond (Art. 10 of the Polish Act on the provision of electronic services); the consent given may be withdrawn at any time without giving any reason, but commercial information sent after sending a request for it, and before the withdrawal of the consent, will be sent in accordance with the law; withdrawal of the consent may make it impossible to provide a full answer to the question asked;
- 5) the legitimate interest of the controller consisting in pursuing claims or defending against claims, in accordance with generally applicable laws, in particular the Polish Civil Code (Art. 6(1) (f) and Art. 9(2)(f) GDPR).

4. RECIPIENTS OF PERSONAL DATA CONTAINED IN CORRESPONDENCE

We may disclose the content of correspondence in order to assert our claims as part of the proceedings, to entity or persons cooperating with us inter alia on the basis of contracts entrusting the processing of personal data, in order to perform the tasks and services specified in the contract on our behalf, in particular in the field of e-mail or traditional mail service, hosting, IT service, debt collection, advisory services, administrative support. Data may also be disclosed to postal operators, couriers and law firms.

5. RIGHTS OF DATA SUBJECTS

Each data subject has the right to access his/her data and to rectify, delete, limit processing, transfer data, as well as the right to object to the processing of personal data for reasons related to his/her special situation.

6. PRESIDENT OF THE PERSONAL DATA PROTECTION OFFICE

The data subject has got the right to make a complaint with the supervisory authority, which in Poland is the President of the Personal Data Protection Office with its registered office in Warsaw.

7. AUTOMATED DECISION-MAKING

Your data will not be processed in an automated manner, including in the form of profiling, i.e. no decisions that have legal effects on you or in a similar way significantly affect you will not be based solely on automatic processing of personal data and do not involve such an automatically made decision.

8. TRANSFER OF DATA TO A THIRD COUNTRY

The controller generally doesn't transfer personal data to countries outside the European Economic Area (hereinafter EEA). In situation when such a transfer is necessary (e.g. at the request of the data subject), if the controller uses tools of entities that have their registered office outside the EEA or that may store data outside the EEA (your personal data will not be transferred to international organizations), the controller will apply all legally available means (e.g. provided for in Art. 46 of GDPR) to secure such transfer of data. Transfers of data outside the EEA may take place on the basis of the exceptions provided for in Art. 49 of GDPR, provided that the conditions set out in that Article apply. Information about the applied security measures can be obtained by contacting the controller.

9. CITED ACT

GDPR – 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 (OJ EU L 2016 No 119, p. 1)

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wpisana do rejestru przedsiębiorców
prowadzonego przez Sąd Rejonowy
dla m.st. Warszawy,
XIII Wydział Gospodarczy KRS,
pod nr 0000216769
wysokość kapitału zakładowego:
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