

## **PRIVACY POLICY**

The data confidentiality and privacy protection of our Clients are priority issues for us. Therefore, considering the need for security of your personal data, the policy which specifies the rules regarding the method of personal data processing has established at OK System S.A.

Your personal data are processed 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).

### **WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?**

The Controller of your personal data within the meaning of art. 4(7) of the GDPR is OK System Polska S.A. with the registered office in Warsaw (00-807), al. Jerozolimskie 96, entered into the register of entrepreneurs kept by the District Court for the capital city of Warsaw, under the KRS number: 0000402558, (hereinafter referred to as the Controller).

### **HOW CAN YOU CONTACT US?**

In all matters related to the personal data processing, you can contact the Controller at the above-mentioned address of the registered office or via e-mail: bok@oksystem.pl

### **FROM WHICH SOURCES DO WE OBTAIN YOUR DATA?**

Your personal data are obtained directly from you or from persons/third parties, e.g. the party or our Partners on behalf of which you act, and also other publicly available registers. Information is also obtained through the completion of the contact form or through cookies.

### **WHAT DATA DO WE PROCESS?**

In the case of contact with the Controller by means of the website or contact details provided through the website, the Controller processes the data received from you in order to contact you, i.e. name and surname, e-mail address or telephone number, content of an asked question or discussed issue, and possibly other data which you have provided. In connection with the use of cookies for statistical purposes, the Controller may process the following data: the IP address, the duration of a given session and the frequency of visiting the website.

### **WHAT IS THE PURPOSE OF PROCESSING YOUR DATA AND ON WHICH LEGAL GROUNDS IS THIS DONE?**

<b>Purpose of personal data processing</b>	<b>Legal grounds</b>
The implementation of the MULTIPAKIET programme.	The voluntarily given consent – art. 6(1)(a) of the GDPR.
The sale of cinema vouchers.	The personal data processing is required to conclude and perform the agreement – art. 6(1)(b) of the GDPR.
The conclusion and performance of the Agreement, if you are a Party to the Agreement.	The personal data processing is required to conclude and perform the agreement – art. 6(1)(b) of the GDPR.
The provision of answers to a person who got in touch with the Controller through the contact form, by phone or by post.	The legitimate interests of the Controller – art. 6(1)(f) of the GDPR.
The provision of contact persons necessary to handle and perform the agreement concluded with the data subject on behalf of which you act, and to maintain business contacts.	The legitimate interests of the Controller – art. 6(1)(f) of the GDPR.
The processing of any possible complaints, the determination and pursuance of and the defence against claims.	The legitimate interests of the Controller – art. 6(1)(f) of the GDPR.
The performance of legal obligations imposed by the Controller, with regards to keeping of accounts and accounting documentation, as well as exercising the rights of data subjects.	The performance of the Controller’s legal obligation – art. 6(1)(c) of the GDPR.
The sending of marketing contents in the form of a newsletter (which contains, in particular, the	The voluntarily given consent – art. 6(1)(a) of the GDPR.

information regarding your company, new products and current offer) via electronic mail.	
The conduct of direct marketing activities.	The legitimate interests of the Controller – art. 6(1)(f) of the GDPR.
The performance of the process of recruitment and selection of an appropriate person to be employed.	<p>To an extent resulting from art. 22(1) of the Labour Code, one of the legal grounds is also the legal obligation of the Controller (Article 6(1)(c) of the GDPR).</p> <p>This refers to such data as: name(s) and surname, date of birth and contact details indicated by a job applicant. If this is necessary for the performance of specific work or work on a specific post, this also refers to information about education, professional qualifications and the current course of employment. The legal obligation of the Controller also covers the data whose submission is necessary for exercising a right or fulfilling an obligation under the law.</p> <p>If the job applicant provides the amount of personal data which goes beyond the obligations laid down in the labour law, the legal basis for their processing in the above-mentioned purpose is the consent of the job applicant (art.6(1)(a) of the GDPR).</p> <p>This refers to all data provided by the job applicant in their curriculum vitae (CV) and cover letter, or the data made available during interviews.</p>
Collection of information about traffic statistics for the website.	The legitimate interests of the Controller – art. 6(1)(F) of the GDPR.

### **ARE YOUR DATA PROFILED?**

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

## **WHO HAS ACCESS TO YOUR PERSONAL DATA?**

The recipients of your personal data will be:

- a) the Controller's authorised personnel,
- b) the personal data processors who are commissioned by the Controller to process such data for the purpose of achievement of the objectives for which the data are collected (in particular the parties that deliver IT solutions and provide IT and technical support services). Such processors must have access to the data to perform their duties. The processors will have access to the personal data only to an extent that is necessary for the performance of tasks entrusted to them.
- c) public authorities and entities with a public service mission or acting at the request of public authorities, to an extent and for purposes which are laid down in the generally applicable law.

## **CAN YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?**

In view of the fact that the Controller uses the Google Analytics tool, your personal data may be transferred outside the European Economic Area. In connection with the transfer of the data outside the EEC, the Controller has made sure that only the suppliers who provide guarantees for the high level of personal data protection are used. These guarantees stem mainly from the fact of participation of the suppliers in the "Privacy Shield" programme established by virtue of executive decision 2016/1250 of the European Commission (EU) of 12 July 2016 on the adequacy of the protection provided by the EU-US Privacy Shield.

## **HOW LONG DO WE STORE YOUR PERSONAL DATA?**

The data storage period is associated with the purposes and grounds for the data processing, therefore

- d) the data processed pursuant to statutory requirements will be processed for the time during which the legal provisions require the data storage;
- e) the data processed for the period of conclusion and performance of the agreement will be processed for the period necessary for its performance and settlement, which, as the case may be, may be extended by the period of limitation of civil-law claims.
- f) the data processed on the basis of the legitimate interest of the Controller will be processed until the effective submission of an objection or cessation of such interest, e.g. the data

processed for the purpose of pursuance of or defence against claims will be processed for the time equal to the period of limitation of such claims.

- g) the data processed on the basis of a consent will be processed until the consent is withdrawn. This period may be extended by the period of limitation of the pursuance of or defence against the claims. .
- h) the personal data processed for recruitment purposes will be stored until the moment of completion of the recruitment in which you take part. In the case of an additionally expressed consent to the use of data for the purposes of future recruitments, your data will be stored for a period of 9 months.

### **ARE YOU OBLIGED TO PROVIDE YOUR PERSONAL DATA?**

Providing your personal data is voluntary, however, it is necessary for the goal you wish to achieve, including the use of the website, the conclusion of an agreement, the accession of the Multipackage programme, the answer to your question or to an issue raised by you.

The Controller points out that it is the job applicant's obligation to provide the personal data indicated in art. 22(1) of the Labour Law in the light of the applicable provisions of the labour law. Failure to provide them will result in the lack of a possibility to participate in the conducted recruitment process. The provision of personal data by the job applicant, which goes beyond the scope determined in art. 22(1) of the Labour Code is voluntary. The Controller declares that failure to provide such data must not be the basis for unfair treatment of the person who applies for a given job, and also must not cause any negative consequences towards such person, in particular, must not be a reason that justifies the refusal to employ them.

### **WHAT ARE YOUR RIGHTS IN CONNECTION WITH THE PROCESSING OF YOUR PERSONAL DATA?**

You have the right to:

- a) request access to your personal data, to rectify them, erase them or limit their processing, and also to transfer your personal data,
- b) if the basis of the personal data processing is the legitimate interest of the Controller - the right to object to the processing of the personal data at any time for reasons related to the particular situation of the data subject.
- c) if the legitimate interest lies in conducting direct marketing activities - the right to object at any time to the processing of personal data for the purposes of marketing activities, without having to justify such a decision,

- d) withdraw your consent at any time without any effect on the lawfulness of the data processing which was performed on the basis of your consent before its withdrawal,
- e) lodge a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection.

The request for the exercising your rights can be submitted using the contact details provided above.

## **COOKIE POLICY**

Our website uses cookies. By using our website you give your consent to the use of cookies in accordance with the current browser settings.

### **1. What are cookies for?**

For your convenience oksystem.pl uses cookies to adapt the website to the needs of the Users and for statistical purposes. Cookies are small text files sent by a website visited by the internet user to the said internet user's device.

Cookies are also used by websites to which we refer, showing, e.g. multimedia.

The cookies settings can be changed in the internet browser. The lack of changes in these settings means approval for the used cookies.

### **2. What cookies are used by OK System?**

oksystem.pl uses performance cookies for the purpose of collection of information about the way in which the website is used, to make it function better, and functional cookies which allow the user settings to be "remembered" (e.g. language, font size). These include:

- google-analytics.com cookies – statistics for oksystem.pl.
- session cookies (which expire when the session comes to an end)

Third party websites from which we present certain materials may also use cookies which enable logging and serve the purpose of supplying advertisements that correspond to the user preferences and behaviours. In particular, such cookies include:

On youtube.com – cookies containing the user preferences and the click counter (described in the privacy policy at <http://www.google.pl/intl/pl/policies/privacy/>)

### **3. How to increase the protection level?**

The level of protection against cookies is set in each browser:

The level of protection against cookies can be set in your internet browser - including the total blockage of the cookies. This increases the level of security and data protection, but may disable certain functions, e.g. logging into an e-mail account.

#### **4. How to change the settings in the most popular search engines?**

##### **a. Google Chrome**

Click on the menu (in the right upper corner), Settings tab > Show advanced settings. In the "Privacy" section click the Content Settings button. The following cookie settings can be changed in the "Cookies" section.

- i. Deletion of cookies
- ii. Default cookies blocking
- iii. Default permission to cookies
- iv. Default storage of cookies and data of websites until the closure of the browser
- v. Determination of exceptions for cookies from specific websites or domains

##### **b. Internet Explorer 6.0 and 7.0**

From the browser menu (right upper corner): Tools > Internet Options > Privacy, Website button. We set the level with a slider and approve the change with the OK button.

##### **c. Mozilla Firefox**

From the browser menu: Tools > Options > Privacy. Activate the Firefox Programme field: "will use the user settings".

The status of cookies is determined by clicking or not on the "Accept cookies" position.

##### **d. Opera**

From the browser menu: Tool > Preferences > Advanced.

The status of cookies is determined by ticking or not the "Cookies" position.

##### **e. Safari**

In the Safari pull-down menu, select Preferences and click the Security icon. Here the security level is selected in the “Accept cookies” area.

### **CHANGES IN THE PRIVACY POLICY**

We reserve the right to introduce changes in the Privacy Policy, if this is required by the provisions of law or if we take a decision on an increase in the security of your personal data.

The date specified below is the data of applicability of the Privacy Policy in its latest version.

14.10.2019