

Principles of data protection in a company Tomasz Kwaterski „Davotech”

I. Personal Data Administrator

Personal Data Administrator are **Tomasz Kwaterski**, carrying on business under the name Tomasz Kwaterski "Davotech" with headquarters at Al. Jaworowej 27b, 53-122 Wrocław, entered in the Central Register and Information on Business Activity under number 174010, NIP: 899-221-58-76, REGON: 93300425.

II. Personal Data

In the course of its business activities, the Personal Data Administrator processes the following personal data of its contractors:

- a) **identification data** - name and surname of the contracting parties or persons representing the contracting parties, name of the economic entity, numbers of public registers if the person concerned has them,
- b) **contact details** - telephone number, e-mail address, fax number
- c) **correspondence data** - address of residence, address of the registered office of the economic entity, correspondence address),
- d) **other data** - concerning concluded contracts, financial data, bank account numbers;

III. Purposes and basis of data processing

The aforementioned personal data are processed on the basis of generally applicable legal provisions, in particular 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 (hereinafter referred to as GDPR, General Data Protection Regulation), in order to:

- a) the performance of a concluded contract, where the basis for processing is Article 6(1)(b) GDPR;
- b) to document a given legal action and its settlement, on the basis of tax, accounting law, where the basis for processing is Article 6(1)(c) GDPR;
- c) internal purposes of the Personal Data Controller including the running of reports, statistics where the basis for processing is Article 6(1)(f) GDPR;
- d) archiving and storage in terms of safeguarding information in the event of the establishment and assertion of claims or defences, where the basis for processing is Article 6(1)(f) GDPR;
- e) the handling of complaints in the event that they are lodged by contractors with regard to the improper performance of contracts by the Personal Data Controller, where the basis for processing is Article 6(1)(b) GDPR;
- f) carrying out marketing activities, where the basis is the consent of the data subject.

IV. Rights of persons whose personal data is processed

1. Data subjects have the following rights in relation to the processing of their personal data by the Data Administrator:
 - a) The right of access to the content of your data and the right to rectification, erasure, restriction of processing, the right to data portability, the right to object to the processing

- of your data, the right to withdraw your consent at any time without giving any reason, without affecting the lawfulness of the processing performed on the basis of your consent before its withdrawal;
- b) The right of access to lodge a complaint with the President of the Office for Personal Data Protection if he/she considers that the processing of personal data concerning you violates the provisions of the GDPR;
 - c) The right to object to the processing of his/her personal data on the basis of the legitimate interest described above. The Personal Data Administrator will immediately cease processing the Personal Data of the objector for these purposes, unless the Personal Data Administrator demonstrates that there are compelling legitimate grounds for further processing of the data, and in particular it is necessary to protect the interests, rights and freedoms of the data subject or the data is necessary for the Personal Data Administrator's possible establishment, investigation or defence of claims.
2. In the case of the processing of personal data on the basis of consents, at any time the data subject has the right to withdraw his or her consent by directly contacting the Personal Data Administrator in writing to his or her registered address with the reference "Personal Data", without giving any reason, and without affecting the lawfulness of the processing carried out on the basis of the consent before its withdrawal. If this right is exercised, we will stop processing the data for the purpose covered by the consent previously given.
 3. A request for the exercise of data subjects' rights can be made:
 - a) in writing to the address: **Tomasz Kwaterski „Davotech”, Al. Jaworowa 27b, 53-122 Wrocław**
 - b) or e-mail to: rodo@davotech.pl
 4. The request should, as far as possible, indicate precisely what is being requested, in particular:
 - a) which purposes of the processing the request relates to.
 - b) what processing the request concerns
 - c) which right the requester wishes to exercise;
 5. If the Administrator is unable to determine the content of the request or identify the requester based on the notification made, the Administrator will request additional information from the requester.
 6. Requests will be responded to within one month of receipt. If it is necessary to extend this period, the Administrator will inform the applicant of the reasons for such extension.
 7. The reply will be provided to the e-mail address from which the application was sent and, in the case of applications sent by letter, by ordinary mail to the address indicated by the applicant, unless the content of the letter indicates a wish to receive feedback to the e-mail address.

V. Recipients of data

1. In connection with its business activities, the Personal Data Administrator is entitled to disclose collected personal data to external entities, including in particular:
 - a. to suppliers responsible for operating IT systems,
 - b. entities such as banks and payment operators,
 - c. providers of accounting, legal, auditing, consulting services,
 - d. OTAs (online travel agents),
 - e. marketing agencies (within the scope of marketing services),

- f. and to entities related to the Administrator, including its group companies and business partners.
2. If consent is obtained for the processing of personal data, the data covered by the consent may also be made available to other entities for their own purposes, including marketing purposes.
3. The Administrator reserves the right to disclose selected information concerning the User to competent authorities or third parties who request such information on the basis of the relevant legal basis and in accordance with the provisions of the applicable law.

VI. Period of processing

1. The period of data processing by the Personal Data Administrator depends on the type of service provided and the purpose of the Personal Data processing. The collected Personal Data shall be processed for the duration of the cooperation between the Personal Data Administrator and the Data Subject, until the consent given is withdrawn or an effective objection is made to the processing in cases where the legal basis for the processing is the legitimate interest of the Administrator.
2. The processing period may be extended if the processing proves to be necessary for the establishment and assertion of possible claims or the defence against them, and thereafter only if and to the extent that this is required by generally applicable law.
3. After the expiry of the processing period, the Personal Data of the data subjects shall be irreversibly deleted or anonymised.

VII. Data security

1. The Administrator carries out a risk analysis on an ongoing basis to ensure that personal data is processed by him in a secure manner - ensuring, in particular, that only authorised persons have access to the data and only to the extent that this is necessary for their tasks. The Administrator ensures that all operations on personal data are recorded and carried out only by authorised employees and associates.
2. The Administrator shall take all necessary measures to ensure that also its subcontractors and other cooperating entities guarantee the application of appropriate security measures whenever they process personal data on behalf of the Administrator.
3. Detailed rules for the protection of personal data are contained in the Information Security Policy available at the Personal Data Administrator's premises.

VIII. CONTACT DETAILS

Contact with the Administrator is possible via the e-mail address rodo@davotech.pl or via the postal address **Tomasz Kwaterski „Davotech”, Al. Jaworowa 27b, 53-122 Wrocław**