

## **PRIVACY POLICY**

Pursuant to 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; hereinafter referred to as "GDPR"), we inform that:

### **1. CONTROLLER, DATA PROTECTION OFFICER, CONTACT DETAILS**

- 1.1. The controller of your personal data is Veolia ESCO Polska spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw (02-566), at ul. Puławska 2.
- 1.2. The Controller provides services electronically in the form of forms enabling the entry of data, including personal data. The provision of personal data is voluntary, and their processing is carried out in order to respond to a contact inquiry.

### **2. PURPOSE, BASIS AND PERIOD OF PERSONAL DATA PROCESSING**

- 2.1. Your personal data will be processed for the purposes of:
  - 2.1.1. technical support when using the website, based on the necessity to perform a contract to which the data subject is a party or the legitimate interest of the Controller (pursuant to Article 6(1)(b) or, where applicable, (f) of the GDPR);
  - 2.1.2. archiving (evidentiary) purposes carried out by the Controller to secure data in case of a legal need to demonstrate certain facts based on the legitimate interest pursued by the Controller (pursuant to Article 6(1)(f) of the GDPR);
  - 2.1.3. establishing and pursuing potential claims or defending against potential claims based on the legitimate interest pursued by the Controller (pursuant to Article 6(1)(f) of the GDPR).
- 2.2. Your personal data will be processed for the period necessary to achieve the above purposes, but no longer than until the limitation period for any claims expires or until you effectively object to the processing of data.

### **3. CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

- 3.1. Your personal data may be disclosed to the following entities, including IT service providers, hosting providers, entities providing consulting, legal, IT and marketing services.
- 3.2. Furthermore, your personal data may be made available to entities and bodies authorized to process such data under absolutely binding legal provisions.
- 3.3. Personal data may be transferred to third countries (outside the European Economic Area), in particular in connection with the Controller's use of global IT solutions. Data may be transferred to third countries for which the European Commission has issued a decision on an adequate level of protection. In the case of third countries for which such a decision has not been issued, the transfer of data may be carried out on a case-by-case basis while ensuring one of the safeguards aimed at ensuring an adequate level of data protection, as referred to in Chapter V of the GDPR. Information on the safeguards referred to in the preceding sentence can be obtained

by contacting the Data Protection Officer at the contact details provided in point I, paragraph 2.

#### **4. RIGHTS OF THE DATA SUBJECT**

4.1 Every data subject may exercise the following rights provided for in the GDPR:

- a) the right of access - obtaining from the controller confirmation as to whether personal data concerning him or her are being processed. If personal data are being processed, the data subject is entitled to access the personal data and the following information: the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period, the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing (Article 15 of the GDPR);
- b) the right to obtain a copy of the data - obtaining a copy of the personal data undergoing processing, with the first copy being free of charge and the controller being entitled to charge a reasonable fee based on administrative costs for any further copies (Article 15(3) of the GDPR);
- c) the right to rectification - the right to obtain from the controller the rectification of inaccurate personal data concerning him or her and to have incomplete personal data completed (Article 16 of the GDPR);
- d) the right to erasure ('right to be forgotten') - the right to obtain from the controller the erasure of personal data concerning him or her where the controller no longer has a legal basis for processing or where the personal data are no longer necessary for the purposes for which they were collected or otherwise processed (Article 17 of the GDPR);
- e) the right to restriction of processing - the right to obtain from the controller restriction of processing where (Article 18 of the GDPR):
  - the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
  - the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
  - the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject;
- f) the right to data portability - the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract and the processing is carried out by automated means (Article 20 of the GDPR);

- g) the right to object - the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims. If, according to the assessment, the interests of the data subject will be more important than the interests of the controller, the controller will be obliged to stop processing the data for these purposes (Article 21 of the GDPR).
- 4.2. To exercise the above rights or to withdraw consent to the processing of personal data, the data subject should contact the controller at the telephone and address details provided in point 1.1. and inform which right and to what extent he or she wishes to exercise.
- 4.3. Every data subject has the right to lodge a complaint with the President of the Personal Data Protection Office if he or she considers that the processing of personal data violates the provisions of the GDPR. The President of the Personal Data Protection Office can be contacted as follows:
- by mail: ul. Stawki 2, 00-193 Warsaw
  - through the electronic inbox available at: <https://www.uodo.gov.pl/en>
  - by phone via the Office's helpline: 606 950 000.
- 4.4. If the data is provided voluntarily, failure to provide it will result in the inability to perform a specific action in the process.

## **5. CHANGES TO THE PRIVACY POLICY**

- 5.1 The Controller reserves the right to introduce changes to the Privacy Policy. The current version of the Privacy Policy is available on the Controller's intranet.