

Privacy Policy

I. Personal data controllers and personal data processing processes

1. The controllers of the personal data of data subjects in the various processing processes are:

Process / Entity	Recruitment	Employees	Customer Service	Debt Collection	Sales	Marketing	Suppliers, potential suppliers	Partners	Applicants	Monitoring and protection of property	Insurance handling	Technical and environmental documentation	External communication	Whistleblowers	Persons representing the Party, contact or responsible for the implementation of specific tasks under the Contract
Veolia EKOZEC Sp. z o.o.	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT	RPWT / OBIT
All Veolia Group Companies	RPWT / OBIT	-----	-----	-----	-----	-----	RPWT / OBIT	-----	-----	-----	-----	-----	RPWT / OBIT	-----	-----
Veolia Energia Polska S.A.	RPWC	RPWC	RPWC	-----	-----	RPWC / OBIT	RPWC / OBIT	-----	-----	-----	-----	-----	RPWC / OBIT	-----	-----

KEY:

OBIT – responsibility for fulfilling information obligations to data subjects.

OBIC – Responsibility for fulfilling information obligations to data subjects as part of Veolia's Group-wide operations in Poland.

RPWT – exercising of the rights of data subjects, i.e. exercising of the right of access to data, the right to rectify data, the right to "be forgotten", the right to restrict data processing, the right to data portability, the right to object to profiling.

RPWC – exercising of the rights of data subjects processed within the framework of activities at the level of the entire Veolia Group in Poland, i.e. exercising of the right of access to data, the right to rectify data, the right to "be forgotten", the right to restrict data processing, the right to data portability, the right to object to profiling.

Veolia Group companies:

- Veolia Energia Polska S.A., ul. Puławska 2, 02-566 Warsaw
- Veolia Energia Warszawa S.A., ul. Puławska 2, 02-566 Warsaw
- Veolia Energia Łódź S.A. , ul. J. Andrzejewskiej 5, 92-550 Łódź
- Veolia Centrum Usług Wspólnych Sp. z o.o., ul. Energetyczna 3, 61-016 Poznań
- Veolia Energia Poznań S.A., ul. Energetyczna 3, 61-016 Poznań

- Veolia Term S.A. ul. Puławska 2, 02-566 Warsaw
- Veolia Industry Polska sp. z o.o., ul. Energetyczna 7A, 61-017 Poznań
- Veolia Północ Sp. z o.o., ul. Ciepła 9, 86-105 Świecie
- Veolia Południe Sp. z o.o., ul. Zagórska 173, 42-600 Tarnowskie Góry
- Veolia Wschód Sp. z o.o., ul. Hrubieszowska 173, 22-400 Zamość
- Veolia Szczytno Sp. z o.o., ul. Solidarności 17, 12-100 Szczytno
- Fundacja Veolia Polska, ul. Puławska 2, 02-566 Warsaw
- PWiK Tarnowskie Góry Sp. z o.o., ul. Opolska 51, 42-600 Tarnowskie Góry
- Veolia EKOZEC Sp. z o.o., ul. Energetyczna 7A, 61-017 Poznań
- Construction Development Center Sp. z o.o., ul. Energetyczna 7A, 61-017 Poznań
- Veolia Wągrowiec Sp. z o.o., ul. Mieczysława Jeżyka 52, 62-100 Wągrowiec
- Veolia Zachód Sp. z o.o., ul. Powstańców Śląskich 28/30, 53-333 Wrocław
- Veolia Energy Contracting Poland Sp. z o.o., ul. Puławska 2, 02-566 Warsaw

2. The data protection officer at the above entities is the person available at the following contact **inspektor.pl.vpol@veolia.com**.
3. The processing of personal data is carried out in accordance with the principles set forth in the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, the Act of July 18, 2002 on the provision of electronic services (Journal of Laws 2002 No. 144 item 1204 as amended) and the provisions of these Regulations, the Act of July 16, 2004. Telecommunications Law (Journal of Laws 2004 No. 171 item 1800 as amended), the Energy Law Act of April 10, 1997 (Journal of Laws 1997 No. 54 item 348 as amended), the Labour Code Act of June 26, 1974 (Journal of Laws 1974 No. 24 item 141 as amended), the Law of March 11, 2004 on Value Added Tax (Journal of Laws 2004 No. 54 item 535 as amended), the Law of September 29, 1994 on Accounting (Journal of Laws 1994 No. 121 item 591) and the Law of September 15, 2000. Commercial Companies Code (Journal of Laws 2000 No. 94 item 1037 as amended), the Act of January 29, 2004. Public Procurement Law (Journal of Laws 2004 No. 19 item 177 as amended).
4. The service provider provides services electronically in the form of forms that allow you to enter data, including personal information. The provision of personal data is voluntary, and its processing is carried out for the purpose of answering a contact inquiry.
5. The recruitment process is conducted for the purpose of hiring data subjects, i.e. job applicants.
6. The processing of employees' personal data is carried out for the purpose of the provision of work by employees and the implementation of generally applicable laws.
7. The customer service process is conducted for the purpose of concluding and performing a contract with a customer, for the purpose of presenting an offer of our own services, and for the purpose of conducting a customer satisfaction survey.
8. The collection process is carried out to recover receivables for services rendered.
9. The sales process is conducted in order to present an offer of their own products and services and conclude a contract.
10. The marketing process is carried out in order to be able to present the offer of own products and services through dedicated communication channels.
11. The processing of supplier data is carried out for the purpose of performing a contract or purchase order.
12. The processing of data of potential suppliers is carried out for the purpose of awarding a contract.
13. The processing of shareholder data is carried out for the purpose of implementing the provisions of the Commercial Law, including the maintenance of the share ledger.
14. The processing of applicants' data is carried out in order to implement the application.
15. The process of monitoring and protection of facilities is carried out to ensure the safety of people residing in the properties managed by Veolia EKOZEC Sp. z o.o., to protect the company's assets.
16. The insurance handling process is carried out to handle claims.

17. The technical and environmental documentation process is conducted to create, use and share technical and environmental documentation and designs in order to receive a fair bid and place a construction contract.
18. The external communication process is carried out in order to provide information on Veolia Group Companies in Poland, to build the reputation of EKOZEC and to build business relations.
19. The whistleblower process is conducted to verify reports of information about irregularities incurred in connection with the duties performed, work performed or contracts performed, and to take corrective action.
20. The process of persons representing the Party, contact or responsible for the performance of specific tasks under the Contract is conducted for purposes related to the performance of the Contract, the establishment, assertion or defence of legal claims arising out of or related to the Contract.

II. Legal basis for processing, retention period, requirement to provide and recipients of personal data

1. The legal basis for the processing of personal data, the duration of data storage, and the form of the data as well as the recipients of the data for each process are:

Process	Recruitment	Employees	Customer Service	Debt Collection	Sales	Marketing	Suppliers and potential suppliers	Shareholders, partners	Applicants	Monitoring and protection of property	Insurance handling	Technical and environmental documentation	External communication	Whistleblowers	Persons representing the Party, contact or responsible for the implementation of specific tasks under the Contract
Legal basis for processing	Article 6(1)(a)	Article 6(1)(a), (b), (c), and (f) and Article 9(2)(b), (h), and (j)	Article 6(1)(b) and (c) and (f) i.e. statistical purposes	Article 6(1)(b), (c) and (f)	Article 6(1)(b) and (f) i.e. statistical purposes	Article 6(1)(a) and (f)	Article 6(1)(b) and (c) and (f) i.e. statistical purposes	Article 6(1)(c)	Article 6(1)(b), (c), (d)	Article 6(1)(f)	Article 6(1)(c) and (d) and Article 9(2)(f)	Article 6(1)(c) and (f)	Article 6(1)(f)	Article 6(1)(c) and (f)	Article 6(1)(f)
Data retention period	1 year	50 years	6 years	3 years	6 years	Until an objection is filed	6 years	5 years	5 years	30 days	6 years after the decision	Throughout the facility's existence	Until an objection is filed	5 years from the date of acceptance of the notification or for the duration of the actions taken in connection with the notification before the competent authorities, when this time exceeds 5 years	For a period of 6 years after the completion of the contract
Voluntary or obligatory provision of data	V	O	V	V	V	V	V	V	V	V	V	Article 6(1)(C) – O Article 6(1) – V	V	Article 6(1)(C) – O Article 6(1) – V	V
Data recipients	couriers, Polish Post, companies of Veolia Group	banks, couriers, Polish Post, contractors, companies of	Banks, couriers, Polish Post, companies of Veolia Group	couriers, Polish Post	couriers, Polish Post, companies of Veolia Group	couriers, Polish Post, companies of Veolia Group	couriers, Polish Post, companies of Veolia Group	banks, shareholders, partners	couriers, Polish Post	third parties who demonstrate a legal interest	insurers, brokers, liquidators, banks,	contractors or potential contractors for construction work	couriers, Polish Post	IT service providers	entities providing courier, postal, IT, legal services, companies of Veolia Group

		Veolia Group													
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KEY:

V – voluntary,
O – obligatory.

2. Recipients of data in the Potential Suppliers process may be:

- Persons and entities who have requested access to the minutes or annexes to the minutes of the procurement proceedings pursuant to Article 96(3) of the PPL.
- Persons and entities authorized to conduct inspections.
- Persons and entities acting in connection with the use of legal remedies by contractors.
- Entities authorized under applicable laws (e.g., courts, the National Board of Appeals, state bodies).
- Entities providing services to the ordering party, such as mail delivery services, printing and archiving services, IT and telecommunications, accounting, finance and tax, consulting or legal services.
- The contracting authority's authorized representative appointed under Article 15 of the Public Procurement Law.

III. Rights of the data subject

1. Any data subject may exercise the following rights under the GDPR:

- (a) the right of access – to obtain confirmation from the controller as to whether its personal data is being processed. If data about a person is processed, they is entitled to access it and obtain the following information: the purposes of the processing, the categories of personal data, information about the recipients or categories of recipients to whom the data have been or will be disclosed, the duration of data storage or the criteria for determining it, the right to request rectification, erasure or restriction of the processing of personal data of the data subject, and the right to object to such processing (Article 15 GDPR);
- (b) the right to obtain a copy of the data – to obtain a copy of the data being processed, with the first copy being free of charge, and for subsequent copies the controller may charge a reasonable fee based on administrative costs (Article 15(3) GDPR);
- (c) the right of rectification – request to rectify personal data concerning it that is incorrect or to complete incomplete data (Article 16 of the GDPR);
- (d) the right to erasure – a request to delete their personal data if the controller no longer has a legal basis for processing or the data are no longer necessary for the purposes of processing (Article 17 of the DPA);
- (e) the right to restrict processing – a request to restrict the processing of personal data (Article 18 of the GDPR) when:
 - the data subject challenges the accuracy of the personal data – for a period that allows the controller to verify the accuracy of the data; the processing is unlawful, and the data subject objects to the erasure of the data, requesting that it be restricted use;
 - the controller no longer needs the data, but it is needed by the data subject to establish, assert or defend a claim;
 - the data subject has objected to the processing – until it is determined whether the legitimate grounds on the part of the controller override the grounds of the data subject's objection;

(f) the right to data portability – to receive in a structured, commonly used machine-readable format the personal data concerning them that they has provided to the controller, and to request that the data be sent to another controller if the data are processed on the basis of the data subject's consent or a contract with them, and if the data are processed by automated means (Article 20 GDPR);

(g) Right to object – to object to the processing of their personal data for the legitimate purposes of the controller, on grounds related to their particular situation, including profiling. Then the controller shall assess the existence of valid legitimate grounds for the processing, overriding the interests, rights and freedoms of the data subjects or grounds for establishing, asserting or defending claims. If, according to the assessment, the interests of the data subject outweigh the interests of the controller, the controller will be obliged to stop processing the data for these purposes (Article 21 of the DPA).

2. In order to exercise the aforementioned rights, the data subject should contact the contact details of the controller provided in Section I, paragraph 1, or the contact details of the Data Protection Officer provided in Section I, paragraph 2, and inform which right and to what extent they wishes to exercise.
3. Each data subject has the right to lodge a complaint with the President of the Data Protection Authority if they considers that the processing of personal data violates the provisions of the GDPR. The President of the DPA can be contacted as follows:
 - a) by mail: ul. Stawki 2, 00-193 Warsaw,
 - b) via electronic mailbox available at: <https://www.uodo.gov.pl/pl/p/kontakt>,
 - c) by phone through the Authority's hotline: 606 950 000.
4. Expressed consents for the processing of personal data can be withdrawn by sending information to the Data Protection Officer at: **inspektor.pl.vpol@veolia.com**.
5. If the data are collected voluntarily, refusal to provide them will result in the inability to perform the action specified in the process.