

**Information policy concerning the protection of the personal data  
of visitors to NOVOL sp. z o.o., including Guests, Participants of Training  
organized by the Data Controller and Contractors**

*Dear Sir or Madam,*

*Pursuant to Article 13.1-2 of the Regulation of the European Parliament and of the Council (EU) 2016/679 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"), we hereby provide the information on the method of processing your personal data and your associated rights.*

**(1) Personal Data Controller**

Pursuant to Article 4.7 GDPR, Data Controller, i.e. an entity determining the purposes and means of the processing is NOVOL sp. z o.o with its registered office in Komorniki (62-052), ul. Żabikowska 7/9 (hereinafter referred to as the "Company").

**(2) Personal Data Protection Supervisor**

The Company has appointed a Data Protection Supervisor (DPS), who may be contacted in matters concerning the protection of personal data and the exercise of associated rights. For this purpose, the Supervisor can be contacted by e-mail at: [ochrona.danych@novol.com](mailto:ochrona.danych@novol.com).

**(3) Purpose and basis of personal data processing by the Company**

The personal data of Guests (visitors to the Company, including representatives of our Customers, suppliers, etc.), Participants of Training organized by NOVOL, as well as Contractors (external entities providing services at the premises of NOVOL, in particular servicing, maintenance, repair works, etc.) can be processed on the basis of Article 6.1(f) GDPR, i.e. on the basis on a legitimate interests of the Company, consisting in:

- ensuring the safety of the area managed by the Company (including through the use of video surveillance, use of individual access cards to the Company's buildings, individual and vehicle traffic in the plant area which require meeting specific security conditions, etc.)

- for archiving (evidence) purposes - protecting the information against the legal need to demonstrate the facts,
- organizing training courses for the Company's contractors and their employees,
- determining and investigating possible claims and managing them when they are raised by third parties.

Providing the data in connection with the implementation of the above objectives is voluntary; however, the refusal to provide the data shall result in the inability to enter the Company's premises personally or by car (applies to Guests, Participants of Training and Contractors).

#### **(4) Rights of Guests, Participants of Training and Contractors in the field of the data processed**

The Company guarantees the right to use of all the rights provided for on the basis of GDPR, which shall apply in certain cases, i.e. the right to request access to one's personal data, the right to rectify, delete the data or to limit its processing, the right to transfer the data, and the right to object to its processing on the terms and in the cases provided for in the provisions of GDPR.

In the case of the processing of personal data by the Company for legitimate purposes (i.e. pursuant to Article 6.1(f) GDPR) referred to in Item (3) above, a natural person has the right to object due to a specific situation.

Moreover, we hereby inform about the right to complain to the supervisory authority, which is the President of the Office for Personal Data Protection.

#### **(5) Transfer of data outside the European Economic Area (EEA)**

The natural persons' data shall not be transferred by the Company outside the European Economic Area (EEA).

#### **(6) Personal data recipients**

Personal data may be disclosed to the following entities:

- a) companies supporting the Company in the field of technical maintenance (including delivery, implementation and maintenance of software and hardware servicing, including video surveillance),

- b) companies providing additional services and supporting the Company's business in such fields as legal services, organization of corporate events or training courses organized by NOVOL sp. z o.o.

#### **(7) Period of storage of personal data**

The personal data obtained shall be processed by the Company for the period necessary to fulfil the legitimate interests pursued by the Company (referred to in this document), and then for archiving purposes for no longer than two years. In addition, personal data may be processed by the Company until the statute of limitations expire and for the period for asserting possible claims.

The personal data obtained in connection with video monitoring shall be processed for the period of 3 months, with the exception of the material used to establish and assert claims (in this case, such material shall be used for the period necessary to establish and assert the claim).