

Information policy in the field of the protection of the personal data of Contractors of NOVOL sp. z o.o. (including natural persons running their own business in the form of sole proprietorship) and natural persons representing the Contractors (in particular employees and co-workers), designated to contact NOVOL sp. z o.o.

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.

Personal Data Controller

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

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

Purpose, legal basis and the period of personal data processing by the Company

Purpose of data processing	Legal basis of data processing	Period of personal data processing
Taking the required action before concluding the contract; concluding and implementing the agreement between the Company and the Contractor, including answering the questions asked, ongoing cooperation with the Contractor and persons designated for contact. If you are our Contractor (including a	Article 6.1(b) GDPR (performance of a contract) or Article 6.1(f) GDPR (legitimate interest involving contacting the persons designated by the Contractor to contact and/or execution of the subject of the agreement)	Period necessary to implement the agreement (executed services).

<p>natural person pursuing business in the form of sole proprietorship), providing personal data is voluntary but necessary to conclude the agreement.</p> <p>If you are a person representing the Contractor, providing personal information is voluntary but necessary to ensure the smooth implementation of the subject matter of the agreement, including contacting on regular basis.</p>		
<p>Recovery of claims and defence against claims arising from business activity.</p>	<p>Article 6.1(f) GDPR (our legitimate interest)</p>	<p>Period of limitation for claims resulting from the law or to the completion of a specific procedure concerning the claims submitted.</p>
<p>Archiving (including for the purpose of evidence) arising from e.g. the necessity to protect the information against the legal need to demonstrate the facts.</p>	<p>Article 6.1(f) GDPR (our legitimate interest)</p>	<p>The period of limitation for claims resulting from the law.</p>
<p>Handling the complaint process, including responding to complaints filed within the time and in the form specified by the law.</p> <p>Providing personal data necessary to carry out the complaint process is voluntary. The refusal to provide the data results in the impossibility to examine the complaint filed.</p>	<p>Article 6.1(f) GDPR (our legitimate interest)</p>	<p>Archiving period specified for filing complaints in the applicable law, in particular Article 74 of the Accounting Act of 29 September 1994</p>
<p>Bookkeeping and tax records.</p>	<p>Article 6.1(c) GDPR in connection with Article 74.2 of the Accounting Act and other specific provisions (implementation of a legal</p>	<p>Retention period for accounting and tax documentation under the provisions of the law.</p>

	obligation)	
<p>Conducting marketing activities related to the activity of NOVOL sp. z o.o., including the establishment of trade relations, sending offers, newsletters, information on promotions, events, preferences and interest research, including data profiling.</p> <p>The processing takes place as part of our legitimate interests or your consent granted.</p>	<p>Article 6.1(f) GDPR (our legitimate interest, which is direct marketing of products and services, including profiling)</p>	<p>For the period necessary to achieve the purpose, but not longer than until you object to the processing of your personal data for this purpose.</p>
	<p>Article 6.1(a) GDPR, (consent of the data subject) in conjunction with Article 10.2 of the Act on Electronic Services, Article 172 of the Telecommunications Law.</p> <p>The aforementioned consent to data processing may be expressed in order to:</p> <ul style="list-style-type: none"> - send business information in electronic form (to the e-mail address specified) - conduct marketing activities using connections via phone (to the phone number specified) 	<p>Your data shall be processed until the consent granted is withdrawn.</p>
<p>Customer satisfaction survey; determining the quality of our service and the level of customer satisfaction with the products and services offered by NOVOL sp. z o.o.</p>	<p>Article 6.1 (f) GDPR (realization of our legitimate interest)</p>	<p>For the period necessary to achieve the purpose, but not longer than until you object to the processing of your personal data for this purpose.</p>

Data recipients

Your personal data may be transferred to the following recipients:

- entities providing support services to the Company, such as software or hosting services (e.g. e-mail) providers, entities supporting the Company in the area of the dispatch of commercial information in electronic form (on the basis of data processing agreements concluded with such entities by the Company),
- entities providing for us advisory, legal or consulting services, etc.
- advertising agencies and other entities intermediary in the sale of our services or the organization of promotional and marketing campaigns,

- subcontractors supporting us in the implementation of the agreement concluded with you, including the handling of correspondence or in the process of customer service,
- entities supporting the Company in the field of accounting or tax services, etc.

In addition, your data may be transferred to the following entities:

- post or courier operators,
- debt collection and debt purchasing entities – in the case you do not pay your amounts due to the Company on time.

Your data shall not be disclosed by the Company outside the European Economic Area (EEA).

Your rights in the field of personal data processing

You have the right to access your data, rectify (correct) it, the right to request to remove your data, limit data processing, as well as the right to transfer the data to the extent and under the terms of GDPR.

Furthermore, if the legal basis of processing your personal data is our legally justified interest, you shall be entitled to object to the processing of your personal data at any time on the basis of a special situation. Moreover, in the case of processing your personal data on the legal basis specified above in order to carry out direct marketing activities, you have the right to object to the processing of your personal data for this purpose at any time.

In the event of processing your data on the basis of a consent granted, you have the right to withdraw your consent to the processing of your personal data at any time, without affecting the lawfulness of data processing that took place before the withdrawal of the consent.

Your data shall not be processed in an automated manner, which could also lead to decisions with legal effects towards you, or significantly affect your situation in a similar way. Possible processing of your personal data in an automated manner, including through profiling, will be only used for analyses and forecasts of your preferences for the purpose of direct marketing (and preparing individual offers and information for you).

Regardless of the rights stipulated above in connection with the processing of your personal data, you have the right to lodge a complaint to a supervisory authority, which is the President of the Office for Personal Data Protection (address: ul. Stawki 2, 00-193 Warsaw).