

## **WHO PROCESSES YOUR PERSONAL DATA**

**Rawlplug Energia Odnawialna spółka z ograniczoną odpowiedzialnością** with its registered seat in Wrocław, Poland is the controller of your personal data.

**Rawlplug Spółka Akcyjna** and **Koelner Rawlplug IP Spółka z ograniczoną odpowiedzialnością** with their registered seat in Wrocław, Poland may be the joint-controllers of your personal data (in the meaning of article 26 of GDPR) in relation to data processed in IT systems of Rawlplug Group<sup>1</sup>.

## **CONTACT DETAILS**

You may contact us at any time in relation to your personal data processed by us.

Contact details: **ul. Kwidzyńska 6, 51-416 Wrocław, Poland**, [gdpr.reo@rawlplug.com](mailto:gdpr.reo@rawlplug.com) ; [gdpr.rsa@rawlplug.com](mailto:gdpr.rsa@rawlplug.com) or [gdpr.krip@rawlplug.com](mailto:gdpr.krip@rawlplug.com)

## **WHAT IS THE PURPOSE AND LEGAL BASIS OF PROCESSING**

Your personal data, as well as personal data of people contacting us in your name, collected in relation to concluding and performing contracts for supply of goods or services by us, are processed for purposes and on legal grounds as follows:

- 1) preparing, concluding and performing a contract with Rawlplug Energia Odnawialna spółka z ograniczoną odpowiedzialnością**, for the duration of a contract and its settlement afterwards – on the basis of article 6 par. 1.b GDPR (hereafter referred to as "performance of a contract");
- 2) compliance with all legal obligations imposed on us**, such as issuing and storing of invoices, carrying out warranties' claims and similar claims, evidencing transactions etc., for the time necessary to comply with such obligations until such obligations expire or become unenforceable - on the basis of article 6 par. 1.c GDPR (hereafter referred to as "legal obligation");
- 3) determining, protecting and enforcing any of our rights**, including assignment of claims against you to third parties, for the time no longer than limitation period - on the basis of article 6 par. 1.f GDPR (hereafter referred to as "legitimate interest"); or for the time necessary to carry out obligations regarding evidencing of transactions - on the basis of legal obligation.
- 4) direct marketing of our products and services**, for the period until your withdrawal of consent – only subject to purposes set out in your separate consent.
- 5) governing the sales, including customer service and analysis of your financial capacity**, for the time needed to render these activities while concluding a contract and any future contracts – on the basis of performance of a contract;
- 6) carrying out summaries, analysis, statistics**, for the time necessary to carry out such activities – on the basis of legitimate interest;
- 7) providing sales-related services**, connected with a contract for sale (for example technical advisory services, trainings, product information services, access to professional platforms etc.), on the basis of a separate agreement, for the time needed to perform these services – on the basis of performance of a contract.

We collect and process personal data for other purpose than above only with your expressed consent and only within the scope of such consent. You are entitled to withdraw the consent at any time, however the withdrawal of the consent will not affect the lawfulness of processing based on consent before its withdrawal.

## **WHAT PERSONAL DATA WE PROCESS?**

At the moment of concluding a contract we request you to provide us with personal data indicated in an order or standard contract forms (if you do not provide us with these data, we will not conclude a contract), regardless we use standard contract or order forms in a particular situation. These personal data may include but are not limited to your name, surname, identification number regarding your business, social security number, e-mail address, data necessary to carry out payment, personal data of people responsible for the performance of the contract (such as name, surname, e-mail, telephone number).

The provision of the above personal data **is voluntary**, however necessary for us to enter into and perform a contract as well as contracts for sales-related services.

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<sup>1</sup> We are the part of the capital Group which consists of the companies enlisted on <https://gdpr.rawlplug.com/processing/> , from time to time referred to as "Rawlplug Group"

## **SHARING OF THE INFORMATION RAWLPLUG RECEIVES**

We share your personal information with:

- 1) **processors processing data on our behalf** with regards to activities rendered on our behalf:
  - a) purchasing agents and other intermediaries in the process of purchasing goods and services;
  - b) suppliers of marketing services for us or sale-related services;
  - c) administrators of our IT systems and providing us with IT tools and resources;
  - d) sub-contractors helping us in performing a contract, for example custom agents, carriers;
  - e) advisors, consultants, auditors, legal and tax advisors, accountants etc.
- 2) **other controllers** processing data in their own name:
  - a) purchasing agents and other intermediaries in the process of purchasing goods and services – to settle their remuneration;
  - b) couriers and post offices;
  - c) payment institutions – to process any payments from or to you;
  - d) assignees – in case of assignment of claims that we may have against you;
  - e) government authorities, business information offices, judiciary, local authorities – if it is necessary under applicable laws;
  - f) joint controllers from Rawlplug Group.

## **THE PERIOD OF PROCESSING**

Particular periods of processing of your personal data by us are indicated in the description of purposes and legal basis of our processing above.

## **TRANSFER OF PERSONAL DATA OUTSIDE EUROPEAN ECONOMIC AREA (EEA)**

We currently do not intend to transfer your personal data outside of the European Economic Area.

## **AUTOMATED INDIVIDUAL DECISION MAKING**

We do not issue any decision basing on automated data processing which produces a legal effect concerning you or considerably affects you.

## **YOUR RIGHTS**

GDPR gives you following rights in relation to your personal data:

- 1) **accessing your personal data** (including receiving copies of them) – under article 15 GDPR;
- 2) **correcting your personal data** – under article 16 GDPR;
- 3) **deleting your personal data** – under article 17 GDPR;
- 4) **to demand restriction of processing** – under article 18 GDPR;
- 5) **to demand transmission of personal data** – under article 20 GDPR.

You may enforce the above rights by contacting the controller or sending a respective email to our address: [gdpr.reo@rawlplug.com](mailto:gdpr.reo@rawlplug.com)

We may require additional information enabling us to verify your identity and your right to enforce the above rights.

## **RIGHT TO OBJECT**

Apart from rights referred to in preceding paragraphs, you have the right to object, at any time, to processing of your personal data by us (including profiling) for direct marketing purpose. After filing the objection, we will restrain from processing your data for this purpose.

You have also right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest or public interest (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 defence of legal claims.

## **COMPLAINT**

You have the right to lodge a complaint to a data protection office competent for the seat of the controller. You may find detailed information and contact details on following website: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

In Poland, you may file the complaint to the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warszawa, tel. 22 531 03 00, email: [kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl)

- if you are of the opinion that we process your personal data illegally