

Privacy Policy for Clients of Pakato Beata Kossakowska, Grzegorz Kossakowski s.c.

I. Personal Data Administrator

We kindly advise that the administrator of your personal data is PAKATO Beata Kossakowska, Grzegorz Kossakowska s.c. z siedzibą w Poznaniu (61-131) przy ul. Katowicka 35/123, identification numbers : TAX ID 7822183450, known as the Company. In all cases related to personal data protection, you can contact us by calling to 61 875 60 75, e-mail: pakato@pakato.pl

II. Basis and purpose for processing of personal data

In order to provide services in line with the business profile, the Company processes your personal data for various purposes but always in compliance with the law. Below you can find the detailed purposes of personal data processing with legal basis.

Personal data is processed to:

1. **quote and perform a service** – a legal basis of such data processing is art. 6 par. 1 letter B of GDPR, which allows to process the personal data if it is necessary to perform a contract or take any activities aimed to conclude an agreement; if you also give your name, we acknowledge that you have consented to process your name as well — in this case, the legal basis for processing is art. 6 par. 1 letter A of GDPR, which allows to process personal data based on a voluntary consent;
2. **consider a complaint** - a legal basis of such data processing is art. 6 par. 1 letter B of GDPR, which allows to process the personal data if it is necessary to perform a contract or take any activities aimed to conclude an agreement; if you also give your name, we acknowledge that you have consented to process your name as well — in this case, the legal basis for processing is art. 6 par. 1 letter A of GDPR, which allows to process personal data based on a voluntary consent;
3. **Electronic communication of marketing offers** regarding offers, promotions and our new products - the legal basis for processing is art. 6 par. 1 letter A of GDPR, which allows to process personal data based on a voluntary consent;
4. **Sending a newsletter** regarding offers, promotions and our new products - the legal basis for processing is art. 6 par. 1 letter A of GDPR, which allows to process personal data based on a voluntary consent;
5. **Phone communication** regarding a service - the legal basis for processing is art. 6 par. 1 letter A of GDPR, which allows to process personal data based on a voluntary consent;
6. **Issue an invoice and comply with other requirements arising from the tax law**, such as storage of the accounting records for 5 years - the legal basis for processing is art. 6 par. 1 letter C of GDPR, which allows to process personal data if such processing is necessary for the Personal Data Administrator to comply with the legal requirements;
7. **Create GDPR records**, including, for example, records of clients who objected according to GDPR – the legal basis for processing is art. 6 par. 1 letter C of GDPR, which allows to process personal data if such processing is necessary for the Personal Data Administrator to comply with the legal requirements; secondly, art. 6 par. 1 letter F of GDPR which allows to process the personal data if in this manner the Personal Data Administrator pursues its legally justified interest (in this case, the Company's interest is to have the knowledge on persons who exercise their authorizations resulting from GDPR).
8. **Establish, pursue or defend against claims** - the legal basis for processing is art. 6 par. 1 letter F of GDPR, which allows to process the personal data if in this manner the Personal Data Administrator pursues its legally justified interest (in this case, the Company's interest is to have the personal data that will allow to establish, pursue or

defend against any claims, including clients and third persons);

9. **Use records and evidence** — for protection of information that may be used to show the facts of legal importance. The legal basis for processing is art. 6 par. 1 letter F of GDPR, which allows to process the personal data if in this manner the Personal Data Administrator pursues its legally justified interest (in this case, the Company's interest is to have the personal data that will allow to prove certain facts related to the service, i.e. when a state authority demands it);
10. **Use cookies** on the website we process such textual information (cookies will be discussed in a separate section). The legal basis for processing is art. 6 par. 1 letter A of GDPR, which allows to process personal data based on a voluntary consent (on first visit to the website, a query of consent to use cookies appears);
11. **Administer website**— the data is saved automatically as the so-called server logs with every use of the Company's website. Administration of a website with no use of a server and no automatic recording would not be possible. The legal basis for processing is art. 6 par. 1 letter F of GDPR, which allows to process the personal data if in this manner the Personal Data Administrator pursues its legally justified interest (in this case, the Company's interest is to administer the website);

III. Right to withdraw consent

1. If processing of personal data is done based on a consent, you can withdraw it at any time – at your discretion.
2. If you would like to withdraw your consent to process your personal data, please:
 - Send the e-mail directly to the Company to pakato@pakato.pl or
 - Send the e-mail to the Data Protection Inspector to pakato@pakato.pl or
3. If processing of your personal data has been done based on your consent, its withdrawal will not cause that the processing of data was illegal. In other words, until the withdrawal of your consent we may process your personal data and the withdrawal will not affect compliance of the existing processing with legal regulations.

IV. Requirement to provide personal data

Provision of any personal data is voluntary and is done at your discretion. However, in some cases, providing personal data is necessary to meet your expectations in respect of the service.

V. Automated decision making and profiling

We kindly advise that we do not perform automated decision making, including based on profiling. The content of the query which is sent is not subject to automated evaluation by the IT system.

VI. Recipients of personal data

1. As most entrepreneurs, we use other entities in our business, which often necessitates the transfer of personal data. Therefore, as needed, we transfer your personal data to the IT suppliers, lawyers who perform services, accounting company, hosting company, insurance company, courier company, where such entities process the data based on the agreement with the administrator and according to its instructions.
2. In addition, it may happen that based on the relevant regulation or decision of an authority, we will have to transfer your personal data to other entities, whether public or private. Therefore, we find it difficult to foresee who will demand your personal data. But still we can ensure that any case of demanding to share your personal data is analyzed very carefully not to transfer any data to any unauthorized parties.

VII. Transfer of personal data to third states

1. As most entrepreneurs, we use various common services and technologies offered by such entities as Facebook and Google. These businesses are seated outside the European Union and in the light of GDPR are considered third countries.

2. GDPR introduces certain restrictions in transferring personal data to third states because as no European regulations apply therein, the protection of personal data of EU citizens may be unsatisfactory. Therefore, every administrator of personal data is required to establish a legal basis for such data transfer.
3. From our part, we guarantee that when using the services and technologies, we transfer personal data to only the U.S. entities and to those who participate in the Privacy Shield program based on the executive decision of the European Commission of 12 July 2016 – more on this can be read at the European Commission’s website at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_pl. Entities who participate in the Privacy Shield Program, guarantee that they will follow high standards in respect of personal data protection, applied in the European Union making the use of their services and technologies in the process of personal data processing compliant with law.
4. We will give you any additional explanation regarding the transfer of your personal data at any time, in particular, when this issue is of your concern.
5. You may obtain a copy of your personal data transferred to a third state at any time.

VIII. Period of personal data processing

1. According to the applicable provisions of law, we do not process your personal data “all the time” but for the time needed to achieve a set objective. After this period, your personal data will be irrevocably deleted or destroyed.
2. Where we do not need to perform any other operations on your personal data than storage (for example, when we store an order to defend against claims) we protect the data until permanent removal or destruction – by pseudonymization. Pseudonymization consists in the encryption of personal data or a collection of personal data so that nobody can read it without a key thus making this data completely useless for an unauthorized person;
3. Regarding the individual periods of personal data processing, we kindly advise that we process personal data for the following periods:
 - Contract term — in relation to personal data processed to conclude and perform a contract;
 - 3 years or 10 years + 1 year — in relation to personal data processed to establish, pursue or defend claims (length of period depends on if both parties are entrepreneurs);
 - 12 months — in relation to personal data collected when quoting a service and a contract has not been concluded immediately;
 - 5 years — in relation to the personal data related to complying with requirements of the tax law;
 - Until withdrawal of consent or achieved goal of processing, but not longer than for 5 years — in relation to the data processed based on the consent;
 - Until an effective objection or achieved processing goal, but not longer than for 5 years — in relation to the personal data based on the legally justified interest of the Personal Data Administrator or for marketing purposes;
 - Until becoming outdated or no longer useful, but not longer than for 3 years — in relation to personal data processed mainly for analytical purposes, using cookies and managing the website.
4. We count periods in years from the end of the year in which we commenced processing of personal data to improve the removal or destruction of personal data. Separate counting of the term for every contract would involve significant organizational and technical difficulties as well as financial input so a single date for removal or destruction of personal data allows us to improve the management of this process. Obviously, in case of your use of the right to forget, such situations are considered individually.
5. An additional year related to processing of personal data collected for the contract is provided because you may file a

claim before the limitation period, a claim may be delivered with delay or you may erroneously determine your limitation period.

IX. Rights of data subjects

1. We kindly advise that you have the right to:
 - Access your personal data;
 - Correct your personal data;
 - Remove your personal data;
 - Restrict processing of your personal data;
 - Object against processing of your personal data
 - Transfer your personal data.
2. We respect your rights arising from personal data protection regulations and try to facilitate these are complied with as much as possible;
3. We point that the said rights are not absolute and in some cases we may legally refuse your right. If we refuse to consider a claim, it is done only after a thorough analysis and only when the refusal is necessary;
4. Regarding the right to object, we advise that at any time you may object to the processing of personal data based on a justified interest of the Data Administrator in relation to the position you are in. You need to note that according to the laws, we may refuse to consider an objection if we show that:
 - There are legal bases for processing which are superior to your rights, interests and freedoms or
 - There is a basis to establish, pursue or defend claims.
5. At any time you may object to processing of your personal data for marketing purposes. In this situation we will discontinue processing of your data.
6. You may exercise your rights through:
 - Send e-mail directly to the Company to pakato@pakato.pl or
 - Send e-mail to the Data Protection Inspector pakato@pakato.pl or

X. Right to file a complaint

If you believe your personal data are processed contrary to the provisions of law, you may file a complaint to the President of the Personal Data Protection Office.

XI. Final provisions

1. In cases not governed by this Policy of Privacy, the provisions of personal data protection are applicable.
2. Any changes made to this Policy of privacy will be communicated to you by e-mail.
3. This policy of privacy is valid from 25 May 2018.