

Information clause related to the processing of personal data pursuant to Articles 13 and 14 of the GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council 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)

### 1. Who is the controller of your personal data?

The Controller of your data is:

**Captrain Polska Sp. z o. o. based in Wrocław.**

### 2. How to contact us to obtain more information about the processing of your personal data?

You can contact the Controller in writing, by traditional mail or by e-mail: **biuro@captrain.pl**

Personal Data Protection Inspector at Captrain Polska Sp. z o. o. has not been appointed.

Communication at Captrain Polska Sp. z o. o. takes place by e-mail, SMS, MMS, telephone, or post.

### 3. What is the purpose and legal basis for the processing of your personal data by Captrain Polska Sp. z o. o.?

We process your Personal Data when it is necessary for:

- proper performance of a contract/service of a commercial or service nature, including taking action before concluding a contract/accepting an order at the request of the data subject;  
/the provided data will be processed pursuant to Article 6(1)(b) and in accordance with the General Data Protection Regulation/;
- performing activities in accordance with the consents granted by you;  
/the provided data will be processed pursuant to Article 6(1)(a) and in accordance with the General Data Protection Regulation/;
- performing activities required by applicable legal and administrative provisions;  
/the provided data will be processed pursuant to Article 6(1)(c) and in accordance with the General Data Protection Regulation/;
- pursuing the legitimate interest of Captrain Polska Sp. z o. o., and in particular:
  - pursuing or securing claims;
  - analysing the quality of provided services/sales/production;
  - analysing services/sales offered to Captrain Polska Sp. z o.o.
  - searching for clients, offering services, and communicating on matters relating to business cooperation/the provided data will be processed pursuant to Article 6(1)(f) and in accordance with the General Data Protection Regulation/;

### 4. How do we obtain personal data?

Your data are obtained:

- as part of the performance of a contract/service of a commercial or service nature;
  - from publicly available sources;
  - directly from you as part of business communication with the business partner you represent;
- and they include:

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- first and last name;
- company name;
- address and contacts details;
- information on the business activity conducted,

## 5. What are your rights towards Captrain Polska Sp. z o. o. regarding the data processed?

We guarantee that all your rights under the General Data Protection Regulation will be respected, i.e. the right to access, rectify, and delete your data, limit their processing, the right to transfer them, the right not to subject them to automated decision-making, including profiling, and the right to object to the processing of your personal data.

You can exercise these rights when:

- in relation to the request for rectification of data: you notice that your data are incorrect or incomplete;
- in relation to the request to delete data: your data are no longer necessary for the purposes for which they were collected by Captrain Polska Sp. z o. o.; you withdraw your consent to data processing; you object to the processing of your data; your data are processed unlawfully; the data should be deleted in order to fulfil the obligation arising from the law;  
in relation to the request to limit data processing: you notice that your data are incorrect - you may request to limit the processing of your data for a period enabling us to check the accuracy of these data; your data are processed unlawfully, but you do not want them to be deleted; we no longer need your data, but you may need them to defend or pursue claims; or you object to the processing of your data - until we determine whether our legitimate grounds override the grounds for objection;
- in relation to the request to transfer data: the processing of your data takes place on the basis of your consent, or the contract concluded with you and when the processing takes place automatically.

You have the right to lodge a complaint regarding our processing of your personal data with the supervisory authority, which is the President of the Office for Personal Data Protection (address: President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warszawa).

## 6. In what situations can you object to the processing of your data?

You have the right to object to the processing of your personal data when:

- the processing of personal data takes place on the basis of a legitimate interest or for statistical purposes, and the objection is justified by the specific situation in which you find yourself,
- Your personal data are processed for direct marketing purposes, including profiling for this purpose.

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## 7. Who is the recipient of your personal data?

The recipients of your personal data are:

- employees of Captrain Polska Sp. z o.o authorised to process personal data;
- entities providing ICT, organisational, and technical services to Captrain Polska Sp. z o. o.;
- institutions authorised to process personal data under applicable law;

## 8. How long do we process your personal data?

Your personal data will be processed until an objection to their processing is raised, and in the event of an objection - for the period of limitation of claims to which the data subject may be entitled.

For accountability purposes, i.e. to prove compliance with the provisions regarding the processing of personal data, we will store data for the period during which Captrain Polska Sp. z o. o. is obliged to retain data or documents containing them to document compliance with legal requirements and enable control of their compliance by public authorities.

## 9. Do we transfer your data to countries outside the European Economic Area?

Your personal data will not be transferred to third countries outside the European Economic Area.

## 10. Do we process your personal data automatically (including through profiling) in a way that affects your rights?

The processing of your data may be carried out in an automated manner (in ICT systems), but it will not involve automated decision-making, including profiling. This means that Captrain Polska Sp. z o. o. will not assess your personal factors, in particular to analyse or forecast aspects relating to your economic situation, health, behaviour, location, or movement, or any aspects relating to you.

Any decision that may affect you will be made by an authorised employee of Captrain Polska Sp. z o. o.

Captrain Polska Sp. z o. o. makes every effort to ensure effective physical, technical, and organisational measures to protect personal data against accidental or intentional destruction, accidental loss, alteration, unauthorised disclosure, use, or access, in accordance with all applicable legal provisions.

Providing your personal data is voluntary but necessary to perform the activities referred to in point 3 of this information clause, including concluding a contract, executing an order, making a purchase.