



PRIVACY POLICY
LEOSMAK LIMITED LIABILITY COMPANY
WITH ITS REGISTERED OFFICE IN WROCLAW
(„Privacy Policy”)

§1

Purpose of the Privacy Policy

The purpose of the Privacy Policy is to explain the principles under which your personal data is processed and to discuss your basic rights related to the processing of your personal data by Leosmak Ltd.

§2

Personal Data Administrator

The Administrator of your personal data is **Leosmak Sp. z o.o.** with its registered office in Wrocław (52-326) at E. Kwiatkowskiego 4 Street (KRS: 0000911963) (hereinafter: **Administrator, Company** or **Leosmak**). Personal data collected by the Administrator is processed in accordance with the rules set forth in the regulations on personal data protection, including Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th, 2016 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: **RODO**) and in Polish regulations issued in connection with RODO, including the Act of May 10th, 2018 on personal data protection.

The Administrator shall keep personal data confidential and secure it from unauthorized access by third parties under the terms of the aforementioned legal acts.

If you have any questions about the use of your personal data at Leosmak, please contact us:

- by mail to the address: E. Kwiatkowskiego Str. 4, 52-326 Wrocław, Poland
- via e-mail: office@leosmak.com
- by phone: +48 71 715 66 00



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Purposes and basis of processing

As part of its activities, the Administrator collects and processes personal data:

- 1) for the purpose of concluding and executing contracts, including contracts with Leosmak partners (legal basis: Article 6 (1) (b) of RODO);
- 2) for purposes arising from the legitimate interests pursued by the Company as a data controller (legal basis: Article 6 (1) (f) of RODO), namely for:
 - a) marketing of the Company's products or services, including information about the Company's events or activities, in particular through the Leosmak newsletter (hereinafter: **Newsletter**),
 - b) analytical and statistical purposes, as well as providing ICT security related to www.leosmak.com,
 - c) asserting and defending rights related to Leosmak's business activities,
 - d) responding during a phone call or to questions sent and conducting further correspondence via e-mail;
- 3) the purpose of recruiting individuals interested in working or cooperating with the Company, including consideration of candidacy and implementation of the recruitment process (legal basis, respectively: Article 6(1) (b), Article 6 (1) (c) and Article 6 (1) (a) of RODO);
- 4) to the extent necessary to fulfill legal obligations incumbent on the Administrator, in particular accounting, tax or complaint handling obligations (legal basis: Article 6 (1) (c) of RODO).

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Rights under RODO

The provision of personal data by you is by default voluntary, however, depending on the circumstances, their provision may be necessary for Leosmak to provide services or to take other actions. In the event that the provision of personal data is necessary, refusal to provide the data or a request for its deletion may prevent the Administrator from, in particular: contacting you, responding to your inquiry or conducting correspondence, providing you with information about the Company's events and activities (including through the Newsletter), recruiting in which you participate or performing a service or contract.

Leosmak Ltd.

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In accordance with the principles set forth in data protection laws – and to the extent provided therein – you have the following rights:

- 1) **The right to withdraw consent to the processing of personal data** – (to the extent that personal data is processed on the basis of consent) the right to withdraw consent at any time. Withdrawal of such consent shall not affect the lawfulness of processing carried out on the basis of consent before its withdrawal;
- 2) **The right to access and receive a copy of your personal data** – the right to be informed about the processing of your personal data and, in the case of processing, the right to access such data; the right to obtain a copy of personal data concerning you that is held by Leosmak and certain other information in this regard;
- 3) **The right to rectification of personal data** – the right to request the correction of any incomplete or incorrect personal data;
- 4) **The right to erase personal data** – the right to request erasure of personal data in certain situations. Leosmak may refuse to delete personal data, i.e. due to the necessity of preserving the data for the purpose of compliance with the law or for the purpose of asserting claims and defending rights;
- 5) **The right to restrict the processing of personal data** – the right to request restriction of processing of personal data (suspension of processing);
- 6) **The right to transfer personal data** – the right to request assistance in transferring personal data to another entity;
- 7) **The right to file an objection:**
 - a) the right to object to the processing of personal data based on Leosmak's legitimate interests or the legitimate interests of third parties – an objection may be raised at any time – on grounds relating to your particular situation. In the event of such an objection, Leosmak will no longer process such personal data unless it demonstrates the existence of compelling legitimate grounds for the processing, overriding your interests, rights and freedoms of the data subject, or grounds for the establishment, assertion or defense of claims,
 - b) the right to object to the processing of data for direct marketing purposes (including sending you the Newsletter) – the objection may be raised at any time to the extent that the processing is related to such direct marketing;
- 8) **The right to file a complaint with the supervisory authority** – the right to lodge a complaint with the data protection supervisory authority, i.e. the President of the Office for Personal Data Protection (PUODO) in Warsaw (Stawki 2 Street, 00-193 Warsaw) or via Electronic Submission Box (ESP).

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Processing period

Your personal data will be processed for a period that depends on the purpose and legal basis of the processing, and in particular on the following terms:

- 1) for the duration of the provision of services and performance of the contract to which the processing of personal data is related, but no longer than until the termination, expiration or dissolution of the contract in question or the statute of limitations on claims;
- 2) until such time as the relevant legitimate interests pursued by the Company as a data controller are realized or an effective objection to the processing is raised;
- 3) when processing is based on consent, data will be processed until consent is withdrawn;
- 4) the period of data processing may result from the regulations when they are the basis for processing.

The period of processing of your personal data referred to the regulations mentioned above, may be extended in the event that the processing is necessary for the establishment or assertion of claims or defense against claims, and after that period – only in the case and to the extent required by applicable law.

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Transfer of personal data to other entities

Your personal data will be shared only with entities authorized by law, having an entrustment agreement with the Administrator or having another legal basis for processing of your personal data.

The administrator may provide your personal data (under the terms of the law), in particular to the following entities:

- 1) directly or indirectly related to the Company, in particular in an organizational or personal way, having its registered office in one of the member states of the European Union;
- 2) state authorities and services, including in particular justice and law enforcement agencies, if required by law;
- 3) third-party providers and supporters of information systems or other technological solutions used by Leosmak (including IT services; website maintenance; database maintenance; Newsletter management tools and electronic communications);
- 4) to third-party providers of accounting and bookkeeping services (including accountants and auditors) to the extent that disclosure is necessary to provide these services to Leosmak;
- 5) legal advisors and consultants serving Leosmak to the extent that disclosure is necessary for the use of their services;

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- 6) entities that deliver shipments, provide scanning, printing, correspondence handling, archiving and destruction of documents, etc., banks – in case of financial settlements;
- 7) Partners that help the Company analyze data by providing analytical tools.

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Transfer of personal data outside the European Economic Area

Exceptionally, the Administrator may transfer your personal data outside the European Economic Area (hereinafter: EEA) when necessary and only to the extent necessary, related, for example, to the provision of services to us by entities outside the EEA, especially IT (e.g. data storage) and marketing (Newsletter service).

When transferring your personal data outside the EEA, the Company shall take all measures to ensure the security of such data and with appropriate data protection standards, in particular by:

- 1) use of standard contractual clauses approved by the European Commission;
- 2) cooperation with processors of personal data in countries for which there has been a relevant decision of the European Commission on the determination of ensuring an adequate level of protection of personal data.

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No profiling

Your personal data is not subject to profiling or any other form of automated decision-making.

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§9

Cookies and other similar solutions

Leosmak uses cookies (i.e. small computer data file sent to your device that identifies it in a way necessary to simplify or cancel a given operation, they may be text files) or other similar technologies in order to personalize content and provide a better user experience on the Leosmak website available at: <https://www.leosmak.com/> (hereinafter: **Website**), as well as enabling the collection and processing of statistical data for the Website operation.

When you use the Website and Newsletter, cookies are used to identify only your browser or device - cookies collect various types of information that do not constitute personal data (they do not allow you to identify the person to whom the personal data relate).

There are three basic types of cookies:

- 1) **session cookies:** specific to a particular visit, limited to sending a so-called session ID (a random string of digits generated by the server) so that you do not have to re-enter the same information when you go to another page of the site or when you leave the site altogether. Session files are not permanently stored on your device and are deleted when you close your browser;
- 2) **permanent cookies:** files that record information about your preferences, stored in the cache memory of your browser or mobile device; and
- 3) **third-party cookies:** placed by third parties outside of Leosmak to collect data from many different websites or sessions.

Leosmak uses cookies for the following purposes:

- 1) proper provision of services and operation of the Website and Newsletter;
- 2) proper security of access to your personal data;
- 3) to better adapt the provision of services to the individual needs and preferences of people using the Website and Newsletter;
- 4) to enable the collection and processing of statistical data on the use of the Website and Newsletter;
- 5) marketing, including advertising of services via the Internet;
- 6) collect information about the use of the Website and Newsletter;
- 7) improve performance, improve the Website and Newsletter.

You may consent to cookies or take other possible actions indicated in the displayed message in order to continue to make full use of the content and functionality of the Website. You can change your browser settings at any time, as well as disable or delete cookies. Detailed information about the

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possibility and methods of handling cookies is available in the settings of your software (web browser). Please note, that disabling cookies may adversely affect the functionality or completely prevent the use of our services.

§10

Changes to the Privacy Policy

We reserve the right to make changes to the Privacy Policy at any time, in particular to update its content and adapt it to the requirements imposed by law. Any changes we make to the Privacy Policy in the future will be published the Website and marked with an effective date. Archived versions of the Privacy Policy are available at the following link: www.leosmak.com.

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Entry into Force

The current version of the Privacy Policy is effective as of October 5th, 2022.

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