

PERSONAL DATA PROCESSING POLICY AT INSTEEL SP. Z O.O. Z O.O.

"Policy"

INSTEEL Sp. z o. o. makes every effort to fulfil the information obligation towards persons whose data is processed by INSTEEL as the data Administrator in every situation. In the case of collecting personal data directly from the person to whom they relate, Insteel Sp. z o. o. provides the necessary information referred to in Article of 13 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (Official EU of EU of 2016, No. 119, P. 1 as amended) hereinafter referred to as GDPR, at the time of collecting this data.

INSTEEL Sp. z o. o. also makes appropriate efforts to provide these individuals with the necessary information in accordance with Article 14 of GDPR. The information in question is provided, if possible, immediately after obtaining the data or at the first contact with the data subject.

§ 1. General provisions

1. Personal data – any information about an identified or identifiable natural person – the data subject. An identifiable natural person is a person who can be identified, directly or indirectly, in particular on the basis of an identifier such as first name and surname, identification number, location data, online identifier or one or more specific factors determining the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person. To the extent necessary, we process data only in accordance with the requirements of GDPR and other legal acts on the protection of personal data.
2. The rules presented in the Policy about the scope and purpose of collecting, processing and using personal data are informative.

§ 2. Personal data administrator

1. The administrator of personal data is INSTEEL Sp. z o. o. with its registered office in Mikołów (43-190) at ul. Żwirki i Wigury 6, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Rzeszów, XII Division Economic of the National Court Register under KRS number: 0000931220, NIP: 7941832009, hereinafter referred to as the Administrator/INSTEEL Sp. z o. o.
2. The Administrator can be contacted as follows:
 - 1) by post to the address of INSTEEL Sp. z o. o. ul. Żwirki i Wigury, 43-190 Mikołów,
 - 2) via e-mail to the e-mail address: sekretariat@insteel-piw.com,
 - 3) by telephone: + 48 32 411 01 28

§ 3. Legal basis and purpose of personal data processing

INSTEEL Sp. z o. o. will process your personal data:

- 1) to conclude and perform the Contract – the legal basis for processing is Article 6, Section 1, Letter b of GDPR;

- 2) to handle complaints and claims, the legal basis for processing is Article 6, Section 1, Letter c of GDPR;
- 3) to fulfil the obligations arising from the law, the legal basis for processing is Article 6, Section 1, Letter c of GDPR;
- 4) for statistical and analytical purposes, the basis for processing is the legitimate interest of the Administrator (Article 6, Section 1, Letter f of GDPR;), while the legitimate interest of INSTEEL Sp. z o. o. is the analysis of the results of the business activity, the development of strategies and forecasts, and the survey of contractors' satisfaction;
- 5) to conduct marketing activities of own products and provide services without the use of electronic means of communication pursuant to Article 6, Section 1, Letter f of GDPR, where the legitimate interest of the Administrator is to conduct activities promoting the INSTEEL Sp. z o. o. activity;
- 6) to ensure communication between the Parties – the basis for processing is the legitimate interest of the Administrator (Article 6, Section 1, Letter f of GDPR;);
- 7) in the event of your consent, to conduct marketing activities of its own products and services using electronic means of communication, according to Article 6, Section 1, Letter a of GDPR and the provisions of other laws requiring consent for such activities;
- 8) to implement the legally justified interest of Insteel Sp. z o.o., consisting in the possible determination or pursuit of claims or defence against claims – the basis for processing is the legitimate interest of the Administrator (Article 6, Section 1, Letter f of GDPR).

§ 4. Obligation to provide personal data

1. Personal data may be made available to other recipients in order to Implement the Contract, in order to fulfil the legal obligation incumbent on the Administrator, based on your consent or for purposes arising from the legitimate interests of the Administrator or a third party.
2. Personal data may also be transferred to entities processing data at the request of the Administrator and their authorised employees, where these entities process personal data on the basis of a Contract with the Administrator and only within the scope of the Administrator's instructions and provided that the confidentiality and proper protection of the processed personal data specified in the applicable law are maintained. We may also transfer personal data to third parties who are members of a group of entities with capital and personal ties to the Administrator.
3. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Administrator transfers personal data outside the EEA only when necessary and with an appropriate level of protection, primarily through:
 - 1) cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued;
 - 2) the use of standard contractual clauses issued by the European Commission;
 - 3) application of binding corporate rules approved by the competent supervisory authority;
 - 4) in the event of data transfer to the USA – cooperation with participating entities in the Privacy Shield program, approved by the decision of the European Commission.

4. The administrator always informs about the intention to transfer personal data outside the EEA at the stage of their collection.

§ 5. Personal data storage period

1. Personal data in a form enabling identification of the data subject will be stored by INSTEEL Sp. z o. o. for the period necessary to achieve the purposes of the data processing indicated in §3, i.e. for a period not longer than is necessary for the purpose of:
 - 1) performance of the contract/contracts – until they are terminated or expire;
 - 2) establishing, investigating or defending against claims – until the claims expire;
 - 3) fulfilment of applicable legal obligations – until the obligations arising from the law expire.
2. In the case of data processed on the basis of your consent, personal data will be stored until its withdrawal or objection, depending on which of the events occurs first.

§ 6. Personal data protection

1. Employees at INSTEEL Sp. z o. o. and entities cooperating with us, in the field of personal data processing, are obliged to maintain secrecy and absolute compliance with the law in the field of personal data protection.
2. We take all necessary organisational, technical and legal measures to ensure an adequate level of protection of the personal data we hold, in particular, protection against the risk of unauthorised and unlawful destruction, manipulation, loss, alteration, disclosure or unauthorised access. Our security measures are constantly improved due to the progress of technical information exchange.

§ 7. Permissions regarding the processed data

1. Data subjects have the following rights:
 - 1) Right to obtain information about personal data processing – on this basis, the person making such a request shall be provided by the Administrator with information about the processing of data, including, in particular, about the purposes and legal grounds for the processing, the scope of data held, entities to which they are disclosed and the planned date of their removal;
 - 2) Right to obtain a copy of the data – on this basis, the Administrator shall provide a copy of the processed data concerning the person submitting the request;
 - 3) Right to rectification – The administrator is obliged to remove any inconsistencies or errors in the processed personal data, and supplement them if they are incomplete;
 - 4) Right to delete data – on this basis, one can request the deletion of data the processing of which is no longer necessary to achieve any of the purposes for which they were collected;
 - 5) Right to restriction of processing – in the event of such a request, the Administrator ceases to perform operations on personal data, except for operations to which the data subject has consented and their storage, in accordance with the adopted retention rules, or until the reasons for limiting data processing cease to exist (e.g. issued decision of the supervisory authority allowing for further data processing);
 - 6) Right to data portability – on this basis, to the extent that the data is processed in connection with the concluded contract or consent, the Administrator will issue the data provided by the person to whom they relate, in a format that can be opened on a

computer. It is also possible to request the data be sent to another entity – however, provided that there are technical possibilities in this respect both on the part of the Administrator and this other entity;

- 7) Right to object to data processing for marketing purposes – the data subject may object to the processing of personal data for marketing purposes at any time, without the need to justify such an objection;
 - 8) Right to object to other data processing purposes – the data subject may at any time object to the processing of personal data on the basis of the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to the protection of property). An objection in this regard should contain a justification;
 - 9) Right to withdraw consent – if the data is processed on the basis of consent, the data subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before the consent is withdrawn.
 - 10) Right to complain – if it is found that the processing of personal data violates the provisions of GDPR or other provisions regarding the protection of personal data, the data subject may submit a complaint to the President of the Office for Personal Data Protection.
2. A request regarding the exercise of the rights of data subjects can be submitted in the following way:
 - 1) by post to the address of INSTEEL Sp. z o. o. ul. Żwirki i Wigury 6, 43-190 Mikołów,
 - 2) via e-mail to the e-mail address: sekretariat@insteel-piw.com.
 3. If the Administrator is unable to identify the person submitting the request on the basis of the data contained in the application, he will ask the requester for additional information. Providing such data is not mandatory, but failure to provide it will result in a refusal to process the request.
 4. The request may be submitted in person or through a proxy (e.g. a family member). Due to data security, the Administrator encourages the use of a power of attorney in the form certified by a notary public or an authorised legal adviser or attorney, which will significantly speed up the verification of its authenticity.
 5. The response to the request should be provided within one month of its receipt. If it is necessary to extend this period, the Administrator informs the requester about the reasons for such an extension.
 6. The answer is given in writing unless the request was submitted by e-mail or requested to be provided in an electronic form.
 7. The administrator stores information about the submitted request and the person who submitted the request in order to ensure compliance and to determine, defend or pursue possible claims of data subjects. The register of requests is stored in a manner that ensures the integrity and confidentiality of the data it contains.
 8. The procedure regarding submitted applications is free of charge. Fees may be charged only in the case of:
 - 1) a request for the second and each subsequent copy of the data (the first copy of the data is free of charge);
 - 2) excessive (e.g. extremely frequent) or manifestly unjustified requests made by the same person; in this case, the Administrator may request the payment of a fee.
 9. In the event of questioning the decision to impose a fee, the data subject may submit a complaint to the President of the Office for Personal Data Protection.

§ 8. Final provisions

1. The policy is reviewed on an ongoing basis and updated if necessary.
2. the privacy policy of the Insteel Sp. z o. o. website constitutes Annex 1 to this Policy.

Annex:

1. Website privacy policy www.insteel-piw.com.

Annex 1.

WWW.INSTEEL-PIW.COM WEBSITE PRIVACY POLICY

§ 1. General provisions

1. This Website Privacy Policy www.insteel-piw.com is for information purposes only. It is an expression of care for the safety and privacy of Users visiting the above-mentioned website.
2. The website automatically collects information that has been provided voluntarily by Users and information about connection parameters (date, time, IP address).
3. The website performs the function of obtaining information about the Users by:
 - 1) saving cookies on end devices (computers and mobile phones),
 - 2) information voluntarily entered by Users in the contact form,
 - 3) information voluntarily entered by Users in the application forms.

§ 2. Cookies

1. The website uses cookies i.e. small files sent by a web server, which are then stored on the User's end device and are intended for using the website. Cookies usually contain the name of the website they come from, their storage time on the end device and a unique number.
2. Cookies are used to create anonymous statistical data on visiting the website.
3. The website uses two types of cookies: "session" (session cookies) and "persistent" (persistent cookies). Session cookies are temporary files that are stored on the User's end device until logging out, leaving the website or turning off the software (web browser). "Persistent" cookies are stored on the User's end device for a period of time specified in the parameters of cookies or until they are deleted by the User.
4. Software for browsing websites (web browser) usually allows cookies to be stored on the User's end device by default. Users of the website can independently change the settings in this regard.
5. The web browser allows Users to delete cookies. It is also possible to automatically block cookies. Detailed information in this regard can be found in the help option or documentation of each web browser used by the User. However, restrictions on the use of cookies may affect some of the functionalities available on the website www.insteel-piw.com.
6. Cookie files may also be used by advertising networks, in particular the Google network, to display advertisements tailored to the way the User uses the website. For this purpose, they may keep information about the User's navigation path or the time spent on a given webpage.
7. In terms of information about the User's preferences collected by the Google advertising network, the User can view and edit information resulting from cookies using the following tools: <https://www.google.com/ads/preferences/>.
8. If the User does not want to receive cookies, he can change the browser settings. We reserve that disabling cookies necessary for authentication processes, security, and maintaining User preferences may hinder, and in extreme cases, may prevent the use of the website.
9. The use of cookies to store information and access information stored in the User's telecommunications end device is allowed only under the condition of the User's consent to such use of cookies.

§ 3. Server logs

1. Information about some Users' behaviour may be logged in the server layer. These data are used only to administer the website www.insteel-piw.com and to ensure the most efficient handling of the provided hosting services.
2. Browsed resources are identified by URL addresses. In addition, the following may be recorded:
 - 1) request arrival time,
 - 2) response time,
 - 3) name of the User's station – identification carried out by the HTTP protocol,
 - 4) information about errors that occurred during the execution of the HTTP transaction,

- 5) URL address of the page previously visited by the User (referral link) – if the website was accessed via a link,
- 6) information about the User's browser,
- 7) IP address information. Data indicated in Point 2 are used only for server administration purposes.

§ 4. Data of the personal data administrator

1. The administrator of personal data is INSTEEL Sp. z o. o. with its registered office in Mikołów (43-190) at ul. Żwirki i Wigury 6, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Rzeszów, XII Division Economic of the National Court Register under KRS number: 0000931220, NIP: 7941832009, referred to here as the Administrator.
2. The Administrator can be contacted as follows:
 - 1) by post to the address of INSTEEL Sp. z o. o. ul. Żwirki i Wigury 6, 43-190 Mikołów,
 - 2) via e-mail to the e-mail address: sekretariat@insteel-piw.com,
 - 3) by telephone: + 48 32 411 01 28
3. The personal data collected via the website are collected by the Administrator for the following purposes:
 - 1) Article 6, Section 1, Letter a of GDPR (in order to recruit employees, and contractors, through forms posted on the website),
 - 2) Article 6, Section 1, Letter a of GDPR (in order to use the contact form),
4. The data subject has the right to access their data and correct them. The data are provided by the persons concerned voluntarily; however, without providing them, it is not possible to send data via the forms available on the website. At each point where data is downloaded, there is an appropriate information clause, which is an expression of the fulfilment of the Data Administrator's obligation under Article 13 of GDPR.

§ 5. Application forms – recruitment

1. Providing personal data by Users who want to participate in ongoing recruitments is voluntary.
2. The data is stored in such a way as to exclude the risk of loss or destruction.

§ 6. Contact form

1. Using the contact form service is voluntary.
2. The data is stored in such a way as to exclude the risk of loss or destruction.
3. Data provided in the contact form on the website www.insteel-piw.com are processed for the purpose resulting from its function, i.e. they are used for contact via this website.

§ 7. Data Sharing

1. The operator provides information and data only on the basis of the applicable law.
2. The operator may be required to provide information collected through the website to authorised bodies, only on the basis of legal provisions.

§ 8. Copyright

1. Content presented on the site www.insteel-piw.com is subject to legal and copyright protection.
2. The use of the content presented on the website www.insteel-piw.com requires the prior consent of the Website Operator, indicated in §10 of these Regulations

§ 9. Additional provisions

1. If on the website www.insteel-piw.com links leading to other websites not administered by us are posted, then we cannot be responsible for the content of these websites or for the level of privacy protection implemented by the administrators of these websites. When deciding to enter such websites, the User does so at his own risk. We encourage the Users to familiarise themselves with the privacy policy implemented by these websites before providing personal data.
2. Any questions, requests and suggestions relating to the protection of your privacy, in particular personal data, please submit to the following e-mail address: sekretariat@insteel-piw.com.

§ 10. Operator Data

Website operator of www.insteel-piw.com is INSTEEL Sp. z o. o. with its registered office in Mikołów.