

## Privacy Policy

We greatly appreciate your interest in our company. Data privacy is extremely important to senior management at PDTec. It is generally possible to use the PDTec Sp.zo.o. website without providing any personal data. However, personal data may have to be processed if a data subject wishes to use special services provided by our company through our website. We generally obtain the data subject's consent wherever personal data has to be processed, but there is no legal basis for the processing.

Personal data, such as a data subject's name, mailing address, e-mail address or phone number, for example, is always processed in accordance with the General Data Protection Regulation and the national data protection provisions that apply to PDTec Sp.zo.o. This privacy policy tells the public the nature, scope and purpose of the personal data that we collect, use and process. This privacy policy also educates data subjects about their rights. PDTec Sp.zo.o. being the controller, has taken many technical and organizational measures to protect the data processed through this website as fully as possible. However, we cannot guarantee 100% data protection as data transfers over the internet may generally have vulnerabilities. For this reason, every data subject is free to share personal data with us by alternate means such as the phone.

### 1. Definitions

PDTec Sp.zo.o.'s privacy policy is based on the terminology that the European legislature used in the General Data Protection Regulation (GDPR). We want our privacy policy to be easy to read and understand for the public and for our customers and business partners. With this in mind, we wish to explain the terminology used in this document in advance.

The terminology used in this privacy policy includes, among other things:

#### a) Personal data

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### b) Data subject

"Data subject" means any identified or identifiable natural person whose personal data is processed by the controller.

#### c) Processing

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

“Restriction of processing” means the marking of stored personal data with the aim of limiting its processing in the future.

e) Profiling

“Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

f) Pseudonymization

“Pseudonymization” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

g) Controller

“Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

h) Processor

“Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

“Recipient” means a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law are not regarded as recipients.

j) Third party

“Third party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

k) Consent

“Consent” of the data subject means any freely given, specific informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2. Name and address of the controller

The controller as defined by the General Data Protection Regulation, other data protection laws applicable in Member States of the European Union and other provisions related to data protection is:

PD Tec Sp. z o.o.  
ul. Architektów 67  
81-528 Gdynia  
Polska  
E-mail: [info@pdtec.pl](mailto:info@pdtec.pl)  
[www.pdtec.pl](http://www.pdtec.pl)

## 3. Collection of general data and information

PD Tec Sp. z o.o. website collects a set of general data and information each time a data subject or automated system accesses the website. This general data and information is stored in the server's logfiles. The information collected can include: (1) browser type and versions used, (2) operating system used by the accessing system, (3) the website from which an accessing system reaches our website (referrer), (4) the pages on our website that have been accessed by an accessing system, (5) date and time when the website was accessed, (6) an Internet Protocol (IP) address, (7) the internet service provider of the accessing system and (8) other similar data and information used for security purposes in case of attacks on our IT systems. PD Tec Sp. z o.o. does not draw any conclusions about the data subject when using this general data and information. Instead, the information is required to (1) correctly deliver the content of our website, (2) optimize the content and advertising for our website, (3) ensure the long-term functionality of our IT systems and equipment used to operate our website and (4) provide law enforcement with the information required to investigate cyber-attacks and prosecute perpetrators. PD Tec Sp. z o.o. analyzes the data and information it collects anonymously for statistical purposes and for the purpose of improving data protection and data security at our company. Our ultimate goal is to ensure that the personal data we process is optimally protected. The anonymous data in the server logfiles is stored separately from all the personal data provided by a data subject.

## 4. Option to contact us via the website

PD Tec Sp. z o.o.'s website contains legally required information that allows you to quickly contact our company electronically and communicate with us directly; this includes a general e-mail address. If a data subject contacts the controller by e-mail or via a contact form, the personal data provided by the data subject will be stored automatically. Any such personal data which the data subject voluntarily provides to the controller (pre- and post-name, mail address) is stored for the purpose of processing or for contacting the data subject. This personal data is not shared with third parties. You have every time the possibility to revoke your acceptance or to revoke the data processing without affecting the lawfulness of the already carried out processing.

Therefore, an informational message to [info@pdtec.pl](mailto:info@pdtec.pl) is sufficient.

## 5. Routine erasure and blocking of personal data

The controller processes and stores the data subject's personal data only for the period required to achieve the purpose of storage or where required by laws and regulations in effect in the European Union or another jurisdiction to which the controller is subject.

If the purpose of storage no longer applies or the storage period prescribed by the European legislative and regulatory authority or another applicable legislature expires, the personal data will routinely be blocked or erased as required by law.

## 6. SSL- and TLS encryption

For security reasons, our website uses SSL encryption. This protects transmitted data and cannot be read by unauthorized third parties. An encrypted connection can be recognized by the fact, that the address-line of the browser changes from " http://" to " https:// ". In addition the "lock" icon is visible in your browser-line.

## 7. Data subject Rights

### a) Right to confirmation Artikel 15 DSGVO

Every data subject has the right, granted by the European legislative and regulatory authority, to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed. If a data subject wishes to exercise this right to confirmation, he or she can contact our data protection officer or another employee of the controller at any time.

### b) Right of access

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to obtain from the controller information as to the personal data concerning him or her that is being stored and to obtain a copy of this information. This information will be provided at no charge to the data subject. Furthermore, the European legislative and regulatory authority has granted data subjects access to the following information:

- the purposes of the processing;
- the categories of personal data concerned
- the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

where the personal data is not collected from the data subject:

- any available information as to its source;
- the existence of automated decision-making, including profiling, referred to in GDPR Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

Furthermore, the data subject has a right to be informed as to whether personal data was transferred to a third country or to an international organization. Where this is the case, the data subject also has the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to exercise this right of access, he or she can contact our data protection officer or another employee of the controller at any time.

#### c) Right to rectification Artikel 16 DSGVO

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to obtain without undue delay the rectification of inaccurate personal data concerning him or her. Furthermore, the data subject has the right, taking into account the purposes of the processing, to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she can contact our data protection officer or another employee of the controller at any time.

#### d) Right to erasure (right to be forgotten) Artikel 17 DSGVO

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies and processing is not necessary:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- The data subject withdraws consent on which the processing is based according to GDPR Article 6(1) point (a) or GDPR Article 9(2) point (a) and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to GDPR Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to GDPR Article 21(2).
- The personal data has been unlawfully processed.
- The personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data was collected in relation to the offer of information society services referred to in GDPR Article 8(1).

Where one of the above grounds applies and a data subject wishes to have the personal data stored at PDTec Sp.zo.o. erased, he or she can contact our data protection officer or another employee of the controller at any time. The data protection officer at PDTec Sp.zo.o. or another employee will see to it that the erasure request is satisfied without undue delay.

Where the personal data has been made public by PDTec Sp.zo.o. and our company, in its capacity as the controller as defined by GDPR Article 17(1), is required to erase the personal data, PDTec Sp.zo.o. will take technical and other measures to a reasonable extent given available technology and implementation costs to notify other controllers processing the published personal data that the data subject has demanded to obtain from such other controllers the erasure of any and all links to this personal data or copies or replications of

such data to the extent that processing is not necessary. The data protection officer at PDTec Sp.zo.o. or another employee will take all necessary action in each individual case.

#### e) Right to restriction of processing Artikel 18 DSGVO

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead.
- The controller no longer needs the personal data for the purposes of the processing, but the data is required by the data subject for the establishment, exercise or defense of legal claims.
- The data subject has objected to processing pursuant to GDPR Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where one of the above grounds applies and a data subject wishes to restrict the processing of the personal data stored at PDTec Sp.zo.o., he or she can contact our data protection officer or another employee of the controller at any time. The data protection officer at PDTec Sp.zo.o. or another employee will take all action needed to restrict processing.

#### f) Right to data portability Artikel 20 DSGVO

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format. The data subject also has the right to transmit this data to another controller without hindrance from the controller to which the personal data has been provided, if processing is based on consent pursuant to GDPR Article 6(1) point (a) or GDPR Article 9(2) point (a) or on a contract pursuant to GDPR Article 6(1) point (b) and processing is carried out by automated means, provided that processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to GDPR Article 20(1), the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible and as long as the rights and freedoms of others are not adversely affected.

To exercise the right to data portability, the data subject can contact the data protection officer appointed by PDTec Sp.zo.o. or another employee at any time.

#### g) Right to object Artikel 21 DSGVO

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on GDPR Article 6(1) point (e) or (f), including profiling based on those provisions.

In case of an objection, PD Tec Sp.zo.o. will no longer process the personal data unless PD Tec Sp.zo.o. demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where PD Tec Sp.zo.o. processes personal data for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to the processing for direct marketing purposes by PD Tec Sp.zo.o., PD Tec Sp.zo.o. will no longer process the personal data for such purposes. Furthermore, where personal data is processed by PD Tec Sp.zo.o. for scientific or historical research purposes or statistical purposes pursuant to GDPR Article 89(1), the data subject, on grounds relating to his or her particular situation, has the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To exercise the right to object, the data subject can contact the data protection officer at PD Tec Sp.zo.o. or another employee directly. Furthermore, in the context of the use of information society services and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

#### h) Automated individual decision-making, including profiling

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, provided that the decision (1) is not necessary for entering into, or performance of, a contract between the data subject and the controller, or (2) is authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or performance of, a contract between the data subject and the controller or (2) is based on the data subject's explicit consent, PD Tec Sp.zo.o. will implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

If the data subject wishes to exercise his or her rights relating to automated individual decision-making, he or she can contact our data protection officer or another employee of the controller at any time.

#### i) Right to withdraw consent

Every person subject to the processing of personal data has the right, granted by the European legislative and regulatory authority, to withdraw his or her consent to the processing of personal data at any time.

If the data subject wishes to exercise his or her right to withdraw consent, he or she can contact our data protection officer or another employee of the controller at any time.

#### j) Right to complaint

Without prejudice to any other administrative or judicial remedy, the concerned person has the right to complain to the competent supervisory authority. This depends on the state of your domicile, your work or the probable breach.

#### 8. Google AdWords

We use Google AdWords on our site and in this context the conversion tracking. Google AdWords is an online advertising program of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Clicking on an advert, served by Google, sets a cookie for conversion tracking. Cookies are small text files that are stored on your device and contain information about the websites you visit. As a rule, these cookies lose their validity after 30 days and they support no longer the personal identification of the users. However, if the cookie has not expired and you visit certain pages of our website, Google and we may recognize that the user has clicked on the adverts and has been redirected to our website. Thereby each Google AdWords customer gets a different cookie. As a result, there is no way that cookies can be tracked by websites from AdWords customers. The information, which is collected by conversion cookies, is used to generate conversion statistics for AdWords customers. This will allow customers to see the total number of users who clicked on your advert and were redirected to a conversion-tracking-tag page. However, they do not receive any information that identifies the users. By appropriate settings of your browser software you can object to this use, if you do not want to participate in tracking. This will not include you in the conversion tracking statistics. Furthermore, you can be informed about the setting of cookies by corresponding changes in the browser settings and individually decide on their acceptance or exclude them in general and cause the automatic deletion of cookies when closing the browser window. By disabling cookies you may not be able to use all features of our website. The legal basis for the described processing of personal data is Art. 6 para. 1 lit. f DSGVO. We have a legitimate interest in analyzing user behavior and improving the web site. For more information, see the Google Privacy Policy: <https://policies.google.com/privacy?hl=de>.

#### 9. Data processing through social networks - Facebook

We maintain publicly available profiles in social networks. The individual social networks we use can be found below. Social networks such as Facebook, Google+ etc. can generally analyze your user behavior comprehensively if you visit their website or a website with integrated social media content (e.g. like buttons or banner ads). When you visit our social media pages, numerous data protection-relevant processing operations are triggered. In detail:

If you are logged in to your social media account and visit our social media page, the operator of the social media portal can assign this visit to your user account. Under certain circumstances, your personal data may also be recorded if you are not logged in or do not have an account with the respective social media portal. In this case, this data is collected, for example, via cookies stored on your device or by recording your IP address.

Using the data collected in this way, the operators of the social media portals can create user profiles in which their preferences and interests are stored. This way you can see interest-based advertising inside and outside of your social media presence. If you have an account with the social network, interest-based advertising can be displayed on any device you are

logged in to or have logged in to. Please also note that we cannot retrace all processing operations on the social media portals. Depending on the provider, additional processing operations may therefore be carried out by the operators of the social media portals. Details can be found in the terms of use and privacy policy of the respective social media portals. Legal basis- Our social media appearances should ensure the widest possible presence on the Internet. This is a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. The analysis processes initiated by the social networks may be based on divergent legal bases to be specified by the operators of the social networks (e.g. consent within the meaning of Art. 6 (1) (a) GDPR).

#### Responsibility and assertion of rights

If you visit one of our social media sites (e.g., Facebook), we, together with the operator of the social media platform, are responsible for the data processing operations triggered during this visit. You can in principle protect your rights (information, correction, deletion, limitation of processing, data portability and complaint) vis-à-vis us as well as vis-à-vis the operator of the respective social media portal (e.g. Facebook).

Please note that despite the shared responsibility with the social media portal operators, we do not have full influence on the data processing operations of the social media portals. Our options are determined by the company policy of the respective provider.

#### Storage time

The data collected directly from us via the social media presence will be deleted from our systems as soon as the purpose for their storage lapses, you ask us to delete it, you revoke your consent to the storage or the purpose for the data storage lapses. Stored cookies remain on your device until you delete them. Mandatory statutory provisions - in particular, retention periods - remain unaffected.

We have no control over the storage duration of your data that are stored by the social network operators for their own purposes. For details, please contact the social network operators directly (e.g. in their privacy policy, see below).

#### Facebook

We have a profile on Facebook. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. According to Facebook's statement the collected data will also be transferred to the USA and to other third-party countries.

We have signed an agreement with Facebook on shared responsibility for the processing of data (Controller Addendum). This agreement determines which data processing operations we or Facebook are responsible for when you visit our Facebook Fanpage. This agreement can be viewed at the following

link: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

You can customize your advertising settings independently in your user account. Click on the following link and log in: <https://www.facebook.com/settings?tab=ads>.

Details can be found in the Facebook privacy policy: <https://www.facebook.com/about/privacy/>.

## 10. LinkedIn

We have a LinkedIn profile. The provider is the LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

If you want to disable LinkedIn advertising cookies, please use the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

For details on how they handle your personal information, please refer to LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>.

## 11. Data privacy for job applications and recruitment

The controller collects and processes the personal data of job applicants for the purpose of managing the recruitment process. Processing may be done by electronic means. This is particularly the case if a job applicant submits his or her application documents to the controller electronically, for example, by e-mail or by using a web form on the website. If the controller concludes an employment contract with a job applicant, the transmitted data will be used to administer the employment relationship in compliance with legal requirements. If the controller does not conclude an employment contract with a job applicant, the application documents will be automatically deleted two months after the rejection decision has been communicated unless the controller has other legitimate interests in not deleting them. For the purposes of this clause, other legitimate interest includes, without limitation, an obligation to provide evidence in proceedings under the General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz, AGG).

## 12. Legal basis for the processing

Our company uses GDPR Article 6(1) point (a) as a legal basis for processing operations where we obtain consent for a specific purpose of processing. Where the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case in processing operations that are necessary for the delivery of goods or the provision of another service or counter-consideration, processing is based on GDPR Article 6(1) point (b). The same applies to processing operations that are necessary in order to take steps prior to entering into a contract, such as inquiries about our products or services. If our company is subject to a legal obligation which requires the processing of personal data such as the satisfaction of tax obligations, processing is based on GDPR Article 6 (1) point (c). In rare cases, the processing of personal data might become necessary in order to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor suffered an injury at our facility and we would then have to share the visitor's name, age, health insurance information or other vital information with a physician, hospital or other third parties. In this case, processing would be based on GDPR Article 6(1) point (d). Finally, processing could be based on GDPR Article 6(1) point (f). This is the legal basis for processing operations not covered by any of the legal bases specified above, and where processing is necessary for the purposes of a legitimate interest pursued by our company or by a third party unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject. We are allowed to perform such processing operations particularly because they are specifically mentioned by the European

legislature in applicable laws. The legislature believed that a legitimate interest could be assumed if the data subject is a client of the controller (GDPR Recital 47 sentence 2).

13. Legitimate interests in processing pursued by the controller or by a third party  
If the processing of personal data is based on GDPR Article 6(1) point (f), our legitimate interest is in conducting our business for the well-being of all our employees and shareholders.

14. Period for which personal data is stored

Personal data is stored for a period determined by the applicable legal retention period. At the end of this period, the relevant data will be routinely deleted unless it is necessary for the performance or initiation of a contract.

15. Statutory or contractual requirements for the provision of personal data; requirement for concluding a contract; obligation of the data subject to provide personal data; possible consequences of the failure to provide such data

Please be aware that the provision of personal data is in some cases required by law (e.g. tax provisions) and may also arise from other contractual provisions (e.g. information about the contracting party). In some cases, the conclusion of a contract may require a data subject to provide us with personal data that we will then have to process. For example, a data subject is required to provide us with personal data if our company enters into a contract with him or her. Failure to provide the personal data would render us unable to enter into the contract with the data subject. Before a data subject provides us with personal data, he or she must contact our data protection officer. Our data protection officer will tell the data subject whether, in his or her specific case, the provision of personal data is a statutory or contractual requirement or necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and what the consequences of not providing the personal data would be.