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# GENERAL INFORMATION CLAUSE

## ON THE PROCESSING OF PERSONAL DATA

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**ADMINISTRATOR:**

**INFOCREDIT SERVICE SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ based in Warsaw**

**(referred to in the document as 'ADMINISTRATOR')**

This clause is intended to provide information on how and on what basis we process personal data. In editing it, we have taken into account all legal regulations relating to the subject matter in question, in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter 'GDPR').

**I. Whose personal data do we process?**

The Administrator processes the personal data of the following persons:

- customers,
- employees, contractors and associates
- contractors (outsourcers) and their representatives,
- candidates and potential job applicants,
- other persons whose personal data we collect.

**II. InfoCredit Service Spółka z ograniczoną odpowiedzialnością, with its registered office in Warsaw, as the Administrator, obtains personal data to the extent necessary to fulfil the specified purpose of their processing.**

The Administrator may process the personal data provided both in paper form and in electronic form.

The personal data most frequently processed by the Administrator are:

- personal data of persons participating in the recruitment process organised by the Administrator,
- personal data of our clients, contractors and outsourcers,
- personal data of our employees and contractors,
- other personal data collected by us pursuant to applicable laws.

### **III. Who is the Administrator?**

The controller of your personal data is the entity which alone or jointly with others determines the purposes and means of processing your personal data.

The administrator of your personal data is:

InfoCredit Service Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw

Address: 10 Foksal Street, 00 - 366 Warsaw

KRS: 0000380253

Contact: [odo\\_InfoCreditService@infocredit.pl](mailto:odo_InfoCreditService@infocredit.pl)

As a Administrator we are obliged to process your personal data in accordance with the applicable legal regulations.

At the same time, we would like to inform you that the principles of personal data processing specified herein are also observed by us in the situation when your personal data is entrusted to me by other administrators (in this situation we will act as the so-called processor).

### **IV. Contact details of the Data Protection Officer**

The Administrator has appointed a Data Protection Officer (DPO) within its structures. In order to contact the DPO, please send an email to: [iod\\_InfoCreditService@infocredit.pl](mailto:iod_InfoCreditService@infocredit.pl)

### **V. Purposes and legal basis for the processing of personal data.**

I process the personal data collected by me for the following purposes:

- for the purpose of entering into a contract concluded in connection with our activities arising from the scope of our training activities - the legal basis for processing this data is Article 6(1)(b) of the RODO, i.e. the processing is necessary for the performance of the contract,
- for training purposes - the legal basis for our processing of this personal data is Article 6(1)(b) RODO, i.e. the processing is necessary for the performance of contractual obligations,

- for archiving and evidence purposes - the legal basis for our processing of this data is Article 6(1)(f), i.e. the Administrator's legitimate interest in securing information in the event of a legal need to prove facts,
- in order to assert your claims and protect you against possible claims - the legal basis for processing this data is Article 6(1)(f) RODO, i.e. the processing is necessary for the purposes of the Administrator's legitimate interest,
- in order to offer you our services directly, so-called direct marketing - the legal basis for processing this data is Article 6(1)(f) RODO, i.e. the processing is necessary for the purposes arising from the controller's legitimate interest,
- for the purpose of conducting ongoing correspondence with you - paper and electronic - the legal basis for processing this data is Article 6(1)(f) RODO, i.e. the processing is necessary for the purposes arising from the administrator's legitimate interest,
- for purposes related to the performance of legal obligations incumbent on us (inter alia, in connection with contracts concluded and performed) - the legal basis for the processing of this data is Article 6(1)(c) RODO, i.e. the processing is necessary for the fulfilment of a legal obligation incumbent on the controller.

## **VI. Disclosure of personal data to other entities.**

Your personal data may be entrusted to other entities with whom the Administrator cooperates in order to provide services to you or for other legally permissible purposes. In legitimate situations, your data may be disclosed to other entities, and this disclosure will always be on the basis of applicable laws.

When entrusting personal data to its subcontractors, the Administrator always does so on the basis of personal data processing entrustment agreements concluded with them. Subcontractors processing your data may process your data to the extent necessary for the performance of specific tasks commissioned to them.

As the Administrator, we ensure the correctness of the processing of your personal data also on the part of these entities, which involves the Administrator assuming full responsibility for their actions.

I point out that your personal data may be entrusted to entities with whom we cooperate in the following areas:

- entities with whom we cooperate in the context of IT services, including providers of IT platforms that we use in connection with our business,
- entities that support us in the areas of human resources, payroll and accounting, which support us in the performance of legal obligations related to these areas,
- other entities whose services we use to fulfil our legal obligations.

## **VII. Source of personal data**

We only obtain personal data directly from the data subjects (exceptions may be when the personal data of trainees is made available to us by training providers or entities to which we provide our services).

#### **VIII. Transfer of data to third countries.**

Your personal data may be transferred to third countries, i.e. outside the European Union and the European Economic Area. This is due to the fact that, in providing its services, the Administrator may use social media to communicate with you and maintain an account on the Facebook and LinkedIn platforms (for information on the personal data processed through it, please see clause 11 of this clause). The Administrator may also use Microsoft tools, which may involve the disclosure of personal data to third countries.

I would like to inform you that in each of the aforementioned situations appropriate mechanisms for the transfer of personal data are always applied based on the decision of the European Commission guaranteeing the security of the processing of personal data in a specific country or with the observance of the so-called standard contractual clauses, binding corporate rules or other legal instruments aimed at preserving the GDPR standards applied by us.

#### **IX. Data retention period.**

Your data will only be processed by us for the time necessary to fulfil the indicated purpose, which is:

- the duration of the contract or for the time indicated directly in the content of the contract, as well as for the time necessary for the performance of any settlements related to the contract,
- until such time as we have asserted any claims under the contract concluded or pursued any other legitimate interest of the administrator,
- other periods resulting from legal regulations (concerns data necessary for the performance of legal obligations incumbent on us), in particular periods obliging me to archive the documentation for a specified period of time.

We would like to inform you that we process data only to the extent necessary to fulfil the purposes of processing indicated above. If there is more than one purpose, the relevant retention period is the longer period.

#### **X. Rights concerning data processing:**

You have the following rights regarding the processing of your personal data:

- 1) The right of access to your data and the possibility to obtain a copy of your data (the Controller will provide you with a copy of your personal data if you request it from us in advance).

2) The right to rectification of your processed data (you have the right to request from the Controller the immediate rectification of personal data that are inaccurate and, furthermore, taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by providing an additional statement).

3) The right to request erasure of the processed data (you have the right to request from the Controller the immediate erasure of the data when:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw the consent that is the basis for the Administrator's processing of your personal data;
- when you object to the processing and there are no overriding legitimate grounds for processing;
- the data is processed unlawfully;
- the data should be erased in order to comply with a legal obligation under Polish or European law).

However, the above will not apply if the processing of your data is necessary for:

- exercise your right to freedom of expression and information,
- to comply with a legal obligation requiring processing under European or Polish law,
- to establish, assert or defend claims.

4) Right to restrict processing - You have the right to request the restriction of processing in the following situations:

- when you dispute the accuracy of the data (for a period of time to allow me to check the accuracy of the data),
- when the processing is unlawful,
- when the Administrator no longer needs the data for the purposes of the processing, but the data are necessary for the establishment, investigation or defence of claims,
- when you object to the processing (until it is determined whether the legitimate grounds on the part of the Controller override the grounds for the objection).

5) The right to data portability (to another Controller or directly to you to the extent set out in Article 20 GDPR, in a structured, commonly used machine-readable format).

6) Right to object (you have the right to object at any time to the processing of your data for the purposes of direct marketing, including possible profiling; in this situation, we will not be entitled to process your data unless we demonstrate the existence of:

- valid legitimate grounds for processing which override your interests, rights and freedoms; or
- grounds to establish, assert or defend our claims.

## **XI. Complaint**

You are entitled to lodge a complaint with the President of the Personal Data Protection Authority if you believe that our processing of your personal data violates generally applicable laws. However, we encourage you to contact the Administrator in advance in order to clarify any doubts.

## **XII. Withdrawal of consent for the processing of personal data**

If you have given your consent, you have the right to withdraw your consent to our processing of your personal data at any time by submitting or sending a declaration of withdrawal of your consent to the processing of your personal data by addressing your statements to our registered office address or by email to: [odo\\_InfoCreditService@infocredit.pl](mailto:odo_InfoCreditService@infocredit.pl)

However, your withdrawal of consent will not affect the lawfulness of the processing of your personal data carried out on the basis of the above consent prior to its withdrawal.

## **XIII. Information for persons whose personal data will be processed through social media**

The Administrator will process the personal data of persons who have subscribed to the fanpage, published a comment under a post or sent a private message through the social network Facebook and LinkedIn. The personal data will be collected for the purpose of maintaining a profile on the social network in order to promote the business, attract customers and to answer questions sent in a private message or in a comment under a post and to conduct further correspondence with the user. The legal basis for the processing of this data is Article 6(1)(f) GDPR (the processing is necessary for the purposes of the legitimate interests pursued by the Administrator). Personal data collected by Facebook will be stored in accordance with the regulations and privacy policy of the social network available to you. All other information indicated in the body of this document (with the exception of information on the purpose and legal basis of the processing, retention periods other than those indicated above, which only apply to the extent indicated in this section) shall apply accordingly to the processing of personal data through the Facebook and LinkedIn platform.

You can find out more about the processing of personal data within Facebook here: <https://www.facebook.com/privacy/explanation>

You can find out more about the processing of personal data within LinkedIn here: <https://www.linkedin.com/help/linkedin/answer/a1335577/dostawcy-i-ogolne-rozporzadzenie-o-ochronie-danych-osobowych?lang=pl>

## **XIV. Provision of personal data as a requirement**

The provision of data is not a statutory requirement, but is necessary for the Administrator to fulfil its purposes.

**XV. Information about the absence of automated decision-making (including the absence of profiling).**

Please be informed that the Administrator does not process your personal data for the purpose of automated decision-making.