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## **GENERAL INFORMATION CLAUSE**

### **(GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING AT INFOCREDIT)**

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#### **ADMINISTRATOR:**

**Iwona Surdykowska-Huk conducting business activity under the name Iwona Surdykowska – Huk „InfoCredit”, based in Warsaw, Poland.**

**(in the document referred to as “ADMINISTRATOR”)**

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

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

The Administrator processes personal data of the following individuals:

- customers and users of our website and Infocredit-online platform,
- sole proprietors and representatives of business entities whose personal data is disclosed in publicly available information databases (Central Business Activity Register, National Court Register and other databases), and which may be used by us to create databases of information that are the subject of the services offered,
- employees, contractors and collaborators of Infocredit,
- other persons who provide us with their personal data or which we obtain from other sources in accordance with the law.

#### **II. Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska - Huk „InfoCredit” as Administrator obtains personal data to the extent necessary to fulfill the specified purpose of their processing.**

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

The most commonly processed personal data by the Administrator are:

- personal data of customers using our services,
- personal data of persons or entities with whom we cooperate,
- personal data of individuals or entities that we collect and process as part of the information databases we create,
- personal data of our employees, contractors and collaborators.

Notwithstanding the above, we inform you that we may process other personal data in justified cases, such as personal data of persons participating in the recruitment process organized by the Administrator.

### **III. Who is the controller of personal data?**

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

The administrator of your personal data is:

**Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska - Huk „InfoCredit”**

Address: 10 Foksal Street, 00 - 366 Warsaw

NIP: 5210281798

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

As the administrator of personal data, I am obliged to process your personal data in accordance with applicable laws.

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

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

The Administrator has appointed a Data Protection Inspector (DPO) within its structures. In order to contact the DPO, please direct your message to: [iod@infocredit.pl](mailto:iod@infocredit.pl)

### **V. Purposes and legal grounds for processing personal data.**

The Administrator may process the collected personal data for the following purposes and on the following legal grounds:

- for the purpose of concluding a contract entered into in connection with business activities - the legal basis for processing these data is Article 6(1)(b) of the GDPR, i.e. the processing of personal data is necessary for the conclusion of the contract and subsequent performance of obligations arising from it,
- in order to create databases of information that may contain personal data - the legal basis for the processing of these data is Article 6(1)(f) GDPR, i.e. the processing is necessary for the purposes of the Administrator's legitimate interests,
- for the purpose of providing recipients with comprehensive economic information within the framework of databases, products and services offered and created by the Administrator - the legal basis for the processing of these data is Article 6(1)(f) GDPR, i.e. the processing is necessary for the purposes resulting from the Administrator's legitimate interest,
- for analytical, statistical and scientific purposes- the legal basis for the processing of this data is Article 6(1)(f), i.e. the processing is necessary for the legitimate interest of the Administrator, which is to conduct analyses in order to improve the quality and relevance of the functionalities used and services provided by us,
- in order to assert your claims and protect you against possible claims - the legal basis for processing this data is Article 6(1)(f) of the GDPR, i.e. the processing is necessary for the purposes of the Administrator's legitimate interest,
- in order to offer you my services directly, so-called direct marketing - the legal basis for the processing of this data is Article 6(1)(f) GDPR, i.e. the processing is necessary for purposes stemming from the Administrator's legitimate interests,
- for the purpose of conducting ongoing correspondence with you - paper and electronic - the legal basis for processing this data is Article 6(1)(f) GDPR, i.e. processing is necessary for purposes arising from the legitimate interest of the Administrator,
- for purposes related to the performance of legal obligations incumbent on me (among others, in connection with contracts concluded and performed) - the legal basis for the processing of this data is Article 6(1)(c) GDPR, i.e. the processing is necessary for the fulfillment of a legal obligation incumbent on the Administrator.

## **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, but this disclosure will always be based on 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 to carry out specific tasks assigned to them.

As the Administrator of your personal data, we ensure the correctness of personal data processing also on the part of these entities, which involves the Administrator's assumption of 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 framework of IT services, including providers of IT platforms that we use in connection with our operations,
- 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 fulfill our legal obligations.

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

In addition to data obtained directly from you, some personal data may come from other sources. The Administrator may collect personal data from publicly available sources such as the Central Register and Information on Business Activity, the National Court Register, as well as from other publicly available records.

## **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 personal data processed through it, see clause 11 of this clause). The Administrator may also use tools from the Microsoft suite, which may involve the transfer of personal data to third countries.

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

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

Your data will be processed only for the time necessary to fulfill 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 to perform any settlements related to it,

- until the moment of asserting any claims under the concluded agreement or realization of other legitimate interest of the Administrator,
- other deadlines arising from the law (applies to data necessary for the performance of legal obligations incumbent on the Administrator), in particular deadlines obliging me to archive the documentation for a certain period of time.

Please be informed that I process data only and exclusively to the extent necessary for the purposes of processing indicated above. If there is more than one purpose, the relevant storage period is the longer period.

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

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

- 1) The right of access to your data and the ability to obtain a copy of your data (the Administrator will provide you with a copy of your personal data if you request it in advance).
- 2) The right to rectification of the processed data (you have the right to request the Administrator to promptly rectify personal data that is incorrect, and furthermore, taking into account the purposes of 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 the Administrator to immediately erase the data when:
  - your 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 raise an objection to the processing and there are no overriding legitimate grounds for processing;
  - your data is processed unlawfully;
  - the data should be deleted 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 law 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 that allows me to check its accuracy),
- when the processing is unlawful,
- when the Administrator no longer needs the data for the purposes of the processing, but it is necessary for the establishment, investigation or defense of claims,
- when you object to the processing (until it is determined whether the legitimate grounds on the part of the Administrator override the grounds for the objection).

5) The right to data portability (to another data controller or directly to you to the extent specified in Article 20 of the 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 direct marketing purposes, 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 that override your interests, rights and freedoms, or
- grounds for establishing, asserting or defending our claims.

## **XI. Complaint**

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

## **XII. Information for persons whose personal data will be processed through social media (Facebook, LinkedIn)**

The information contained in this clause shall also apply to the processing of personal data indicated in this clause subject to the content set out below. Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska - Huk 'InfoCredit' processes personal data via social media together with InfoCredit Service sp. z o.o.. To this extent, these entities are joint controllers of personal data

The joint controllers will process the personal data of persons who have subscribed to the fanpage, published a comment under a post or sent a private message via 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, to 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) RODO (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 mutatis mutandis to the processing of personal data through the Facebook and LinkedIn platform.

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

You can learn 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>

All other information indicated in the body of this GDPR information clause shall apply accordingly. At the same time, we point out that in the case of recruitment via LinkedIn, the provisions of the document 'GDPR Information Clause for Recruitment' apply accordingly.

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

Provision of data is not a statutory requirement, but is necessary for the purposes indicated by the Administrator. Without providing some personal data, it may be impossible to perform such activities as concluding a contract with you.

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

Please be informed that the Administrator may process your personal data for the purpose of automated decision-making.