# INFORMATION CLAUSE REGARDING THE PROCESSING OF PERSONAL DATA THROUGH SOCIAL MEDIA

The legal basis for the information provided is Article 12-13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter 'RODO').

This document is in addition to the information provided to you through the social media accounts we maintain.

#### ADMINISTRATORS OF PERSONAL DATA

The co-controllers of your personal data are InfoCredit group entities:

1) Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska - Huk 'InfoCredit'

Address: ul. Foksal 10, 00 - 366 Warsaw

NIP: 5210281798

Contact: odo@infocredit.pl

2) InfoCredit Service Limited Liability Company with its registered office in Warsaw

Address: 10 Foksal Street, 00 - 366 Warsaw

KRS: 0000380253

Contact: odo InfoCreditService@infocredit.pl

Co-administrators jointly maintain a community account for InfoCredit entities, and their representatives jointly undertake all activities in the operation of this account.

# CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

The Joint Administrators have appointed a Data Protection Officer (DPO) within their structures. To contact the DPO, please direct your message to:

- 1) Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska Huk 'InfoCredit' iod@infocredit.pl
- 2) InfoCredit Service Limited Liability Company with its registered office in Warsaw iod\_InfoCreditService@infocredit.pl

COMMON PURPOSES OF PERSONAL DATA PROCESSING AND LEGAL BASIS FOR PROCESSING

The personal data provided by you will be processed by the Joint Administrators on the basis of:

- Article 6(1)(f) of the GDPR (the processing is necessary for the purposes of the legitimate interests pursued by the controller - in order to maintain a profile on the social network and to promote the business conducted, the services offered, to answer questions sent in a private message or in a comment under a post and to conduct further correspondence with the user). We may also store the personal data you provide for the purposes of establishing, investigating or defending against claims (Article 6(1)(f)).

# TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES (OUTSIDE THE EU/EU)

Your personal data in connection with the use of certain social media platforms may be transferred to third countries. i.e. outside the European Union and the European Economic Area. Please be informed that in each of these situations, appropriate mechanisms for the transfer of personal data are always applied based on a decision of the European Commission guaranteeing the security of the processing of personal data in a specific country or with the observance of so-called standard contractual clauses, binding corporate rules or other legal instruments aimed at maintaining the GDPR standards applied by us.

#### **DURATION OF PROCESSING OF YOUR PERSONAL DATA**

The Joint Administrators will process your personal data for the period necessary to fulfil the purposes indicated, in particular: until the deletion of the social media account, the comment or message posted, the objection to the processing of personal data.

### INFORMATION ON RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Your personal data shall be processed by the Controller and by entities cooperating with the Controller in order to fulfil the Controller's legal obligations or to pursue legitimate interests. The basis for the processing of personal data by other entities is a separately concluded data processing agreement. We indicate that we may entrust your personal data 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,
- other entities whose services we use to fulfil our legal obligations.

#### YOUR RIGHTS

You have the right to:

- 1) to access your data,
- 2) request rectification or erasure of your data,
- 3) restrict the processing of your data,
- 4) to have your data transferred,
- 5) the right to object to the processing of your data.

In order to comply with these requests, please contact the Joint Controllers at our contact address. In certain situations, strictly defined by law, the Joint Administrators may refuse to comply with a specific request.

You have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of the processing carried out on the basis of your consent before its withdrawal.

#### RIGHT TO LODGE A COMPLAINT TO A SUPERVISORY AUTHORITY

You are entitled to lodge a complaint with the President of the Data Protection Authority if you believe that our actions are not in compliance with this policy. However, I encourage you to contact the Joint Administrators in advance to clarify any concerns.

#### BASIS FOR REQUESTING PERSONAL DATA

Disclosure of data is voluntary, but necessary to undertake certain activities for which individual personal data are collected, including, in particular, contacting you by InfoCredit group entities.

#### NOTICE ON NON-AUTOMATED DECISION-MAKING BASED ON PERSONAL DATA

Please be informed that we do not process your personal data for the purpose of automated decisionmaking.

# **ADDITIONAL INFORMATION**

When using social media platforms such as Facebook or LinkedIn, the controller of your personal data is also Facebook Inc. or LinkedIn Ireland Unlimited Company, respectively. The actions of these entities with regard to the processing of personal data are subject to the provisions of the terms and conditions and the consents provided by you in the context of your use of these services.