

VALIANS INTERNATIONAL SP. Z O.O. PRIVACY POLICY

Effective date: 25.05.2018

Last modification: 19.10.2018

Valians International Sp. z o.o. with a registered office in Kraków pays special attention to protection of privacy. In order to enhance that, we are providing you with the information about the processing of personal data by Valians International Sp. z o.o.

This privacy policy describes the principles concerning the processing and protection of personal data gathered and processed by Valians International Sp. z o.o., referring to:

- **employees or collaborators of Valians International Sp. z o.o.'s contractors, who were assigned to serve as contact points for Valians or to represent the entities collaborating with Valians International Sp. z o.o. (so-called 'contact points'), see Chapter II of this privacy policy**
- **persons receiving Valians International Sp. z o.o. professional newsletter, see Chapter III of this privacy policy**
- **persons using the contact form made available on Valians International Sp. z o.o. website, see Chapter IV of this privacy policy, as well as**
- **questionnaire and survey respondents and persons contacted due to market research conducted by Valians for the account of clients, but also persons receiving offers for cooperation and those participating in business prospection – see Chapter V of this privacy policy.**

I. DEFINITIONS

The terms listed below and used in this document shall be interpreted accordingly to the following definitions:

Controller or Valians	Valians International Sp. z o.o. with a registered office in Kraków, Feldmana 4/7 Street, 31-130 Kraków, registry numbers and contact details as follows - NIP: 6772367620, REGON: 122526213, tel. +48 12 631 12 89, e-mail: valians@valians-international.com
Personal data or data	information relating to an identified or identifiable natural person, according to the definition from Article 4 (1) of the GDPR
Privacy policy	this document
GDPR	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 (General Data Protection Regulation); the full text of the GDPR can be found here::

	https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679
Website	Valians International Sp. z o.o. website, available in the http://valians-international.com domain

II. INFORMATION ABOUT THE PROCESSING OF DATA RELATING TO EMPLOYEES OR COLLABORATORS OF VALIANS' CONTRACTORS – 'CONTACT POINTS'

Controller of personal data

The controller of personal data is Valians International Sp. z o.o. with a registered office in Kraków, Feldmana 4/7 Street, 31-130 Kraków, registry numbers and contact details as follows - NIP: 6772367620, REGON: 122526213, tel. [+48 12 631 12 89], e-mail: valians@valians-international.com.

Categories and source of personal data

Valians holds your personal data, being your name, last name, phone number, e-mail address and job position, as well as types of projects and/or cases you manage as a person contacting us or representing our contractor.

We gathered your personal data directly from you (providing your data is voluntary, yet necessary for the purposes of contacting you in connection with the project and/or case, in the course of which you were designated as a contact point) or from your employer (entity represented by you), given the fact of your designation as contact point for Valians.

Purposes for the processing of personal data

Valians processes your personal data, meaning the data relating to a person designated by our contractor to serve as contact point for Valians or to represent our contractor for the purposes listed below and based on Valians' legitimate interests, being:

- contacting you in the course of current business, including in relation to performance of contracts for which you were designated as a contact point (contracts entered into between us and your employer or entity which is represented by you), for presenting offers, receiving requests and responding to questions, maintaining ongoing contacts;
- ascertaining, inquiring, defending against claims related to contract entered into with the entity you cooperate with, or which is represented by you, meaning – with Valians contractor.

Retention period of personal data

Valians will be processing your personal data during the period of validity and performance of the agreement, for the purposes of which you were designated as a contact point for Valians, as well as for the period of ascertaining, inquiring and defending against claims arising in relation to the agreement.

Receiving categories of personal data

Only authorized employees of Valians will have access to your personal data. What is more, your personal data may be disclosed to entities performing IT, accounting or legal services for Valians.

Rights of data subjects relating to the processing of personal data

Valians exercises data subjects' rights related to their personal data. The rights are, as follows:

- the right of access to personal data, including the right to obtain a copy of personal data;
- the right to rectification of personal data;
- the right to erasure ('right to be forgotten');
- the right to restriction of processing; as well as
- the right to object to the processing of personal data (if personal data is being processed based on legitimate interests of Valians).

Detailed information about the rights relating to the processing of personal data can be found in part VI of this privacy policy.

In order to use your rights mentioned above, please contact us using the following e-mail address: valians@valians-international.com. The message concerning the exercise of your rights relating to the processing of personal data should include information about your identity (your name, last name), which will serve the purpose of confirming your identity in order to perform your rights mentioned above.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with a supervisory authority, managing the protection of personal data. In Poland, such supervisory authority is the President of Personal Data Protection Office (Prezes Urzędu Ochrony Danych); contact details can be found on the official website www.uodo.gov.pl.

III. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA RELATING TO VALIANS BRANCH NEWSLETTER RECEIVERS

Controller of personal data

The controller of personal data is Valians International Sp. z o.o. with a registered office in Kraków, Feldmana 4/7 Street, 31-130 Kraków, registry numbers and contact details as follows - NIP: 6772367620, REGON: 122526213, tel. [+48 12 631 12 89], e-mail: valians@valians-international.com.

Categories and source of personal data

Valians holds your personal data, being your e-mail address. Sometimes your e-mail address may disclose other personal data, such as your name or last name, if they constitute a part of the e-mail address.

We gathered your personal data directly from you (providing your data is voluntary, yet necessary if you wish to receive our newsletter) or from publicly accessible sources.

Purposes for the processing of personal data

Valians processes your personal data, meaning the data relating to the person receiving our newsletter, for the purposes listed below and based on Valians' legitimate interests, being:

- sending of the branch newsletter prepared by Valians, for the purposes of providing you with information about relevant business branch events, in particular information about Middle, Eastern Europe markets (**branch newsletter does not contain commercial information**);
- maintaining business contacts with the recipient of the newsletter.

Retention period of personal data

Valians will be processing your personal data during the period of your receiving of the newsletter, until you unsubscribe from the newsletter (meaning – up until the point of you objecting to the processing of your personal data). **You may, at any time, resign from the receiving of our newsletter by contacting us, using the e-mail address indicated above.**

Receiving categories of personal data

Only authorized employees of Valians will have access to your personal data. What is more, your personal data may be disclosed to entities performing IT, accounting or legal services for Valians.

Rights of data subjects relating to the processing of personal data

Valians exercises data subjects' rights related to their personal data. The rights are, as follows:

- the right of access to personal data, including the right to obtain a copy of personal data;
- the right to rectification of personal data;
- the right to erasure ('right to be forgotten');
- the right to restriction of processing; as well as
- the right to object to the processing of personal data (if personal data is being processed based on legitimate interests of Valians).

Detailed information about the rights relating to the processing of personal data can be found in part VI of this privacy policy.

In order to use your rights mentioned above, please contact us using the following e-mail address: valians@valians-international.com. The message concerning the exercise of your rights relating to the processing of personal data should include information about your identity (your name, last name), which will serve the purpose of confirming your identity in order to perform your rights mentioned above.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with a supervisory authority, managing the protection of personal data. In Poland, such supervisory authority is the President of Personal Data Protection Office (Prezes Urzędu Ochrony Danych); contact details can be found on the official website www.uodo.gov.pl.

IV. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA RELATING TO PERSONS CONTACTING VALIANS BY USING THE CONTACT FORM AVAILABLE ON VALIANS WEBSITE

Controller of personal data

The controller of personal data is Valians International Sp. z o.o. with a registered office in Kraków, Feldmana 4/7 Street, 31-130 Kraków, registry numbers and contact details as follows - NIP: 6772367620, REGON: 122526213, tel. [+48 12 631 12 89], e-mail: valians@valians-international.com.

Categories and source of personal data

Valians holds your personal data, being your name, last name, or telephone number, gathered as a result of you using the contact form available on Valians' website or during the exchange of messages with us.

Purposes for the processing of personal data

Valians processes your personal data, meaning the data relating to the person contacting Valians by using its contact form, for the purposes listed below and based on Valians' legitimate interests, being:

- contacting you, including responding to your query sent to Valians through contact form available on its website;
- presenting an offer or terms of cooperation with Valians, in response to your query sent to Valians through contact form available on its website.

Retention period of personal data

Valians will be processing your personal data during the period of maintaining ongoing contacts with you, meaning – for the purposes of replying to a query, presenting an offer, an exchange of correspondence and after that period – for the purposes and within the scope necessary for ascertaining, inquiring, or defending against potential claims (until the end of limitation period) .

Receiving categories of personal data

Only authorized employees of Valians will have access to your personal data. What is more, your personal data may be disclosed to entities performing IT, accounting or legal services for Valians.

Rights of data subjects relating to the processing of personal data

Valians exercises data subjects' rights related to their personal data. The rights are, as follows:

- the right of access to personal data, including the right to obtain a copy of personal data;
- the right to rectification of personal data;
- the right to erasure ('right to be forgotten');
- the right to restriction of processing; as well as
- the right to object to the processing of personal data (if personal data is being processed based on legitimate interests of Valians).

Detailed information about the rights relating to the processing of personal data can be found in part VI of this privacy policy.

In order to use your rights mentioned above, please contact us using the following e-mail address: valians@valians-international.com. The message concerning the exercise of your rights relating to the processing of personal data should include information about your identity (your name, last name), which will serve the purpose of confirming your identity in order to perform your rights mentioned above.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with a supervisory authority, managing the protection of personal data. In Poland, such supervisory authority is the President of Personal Data Protection Office (*Prezes Urzędu Ochrony Danych*); contact details can be found on the official website www.uodo.gov.pl.

V. INFORMATION ON PROCESSING OF PERSONAL DATA DUE TO ANALYSIS, SURVEYS, MARKET RESEARCH AND BUSINESS PROSPECTION CONDUCT BY VALIANS FOR THE ACCOUNT OF ITS CLIENTS, AND ALSO FOR THE SUPPORT OF VALIANS' CLIENTS IN TRADE RELATIONS AND THE PRESENTATION OF COOPERATION OFFERS

Controller of personal data

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Categories and source of personal data

Valians processes your personal data for the purposes described below in the form of: e-mail address, name, surname or telephone number, job description / role in the structure of the represented entity. These data are obtained directly from you (eg. during mail exchange or surveys/questionnaires with your participation) or are obtained from external sources, including publicly available databases.

Providing personal data for the purposes described above is not a statutory requirement and does not bear such an obligation on you. However, if the participants do not provide us with the above personal data, their participation in market research and surveys, business prospections and receiving commercial offers will not be possible.

Purposes for the processing of personal data

Valians processes your personal data for the purposes described below, based on the legitimate interest of Valians and Valians' clients, such as:

- conducting surveys and market research as well as gathering the opinions for the account of Valians' clients;
- preparing reports, statements and study for the account of Valians' clients;
- providing Valians' clients with comprehensive and reliable information on entities operating in specific sectors,
- supporting Valians' clients in seeking, establishing, maintaining or developing business relationships with you as a potential contractor.

In addition, Valians may process your personal data - based on a previously granted voluntary agreement – in order to:

- submit a tender or conditions for cooperation with Valians' clients, for the account of whose the aforesaid activities (direct marketing of Valians' clients) are conducted,
- transfer your data to Valians' clients who use Valians' services.

Retention period of personal data

Valians will process your data for the purposes defined above, in particular for the period of conducting research and study or business prospection with your participation, as well as for the period of maintaining business relations with you.

Receiving categories of personal data

Only authorized employees of Valians will have access to your personal data.

Valians will provide its clients and contractors with data used for the needs or obtained during market research and study, only in the form of anonymized analysis and statistical summaries, without providing any information identifying individual participants taking part in these activities.

If, due to the specifics of a given study, there is a need to transfer some of your personal data to Valians' clients or contractors, you will be notified and asked for your free individual consent to such transfer, indicating the purpose and scope of the transferred data. The transfer of data in such case will take place only with your voluntary consent.

What is more, your personal data may be disclosed to entities performing IT, accounting or legal services for Valians.

Rights of data subjects relating to the processing of personal data

Valians exercises data subjects' rights related to their personal data. The rights are, as follows:

- the right of access to personal data, including the right to obtain a copy of personal data;
- the right to rectification of personal data;
- the right to erasure ('right to be forgotten');
- the right to restriction of processing; as well as
- the right to object to the processing of personal data (if personal data is being processed based on legitimate interests of Valians).

Detailed information about the rights relating to the processing of personal data can be found in part VI of this privacy policy.

In order to use your rights mentioned above, please contact us using the following e-mail address: valians@valians-international.com. The message concerning the exercise of your rights relating to the processing of personal data should include information about your identity (your name, last name), which will serve the purpose of confirming your identity in order to perform your rights mentioned above.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with a supervisory authority, managing the protection of personal data. In Poland, such supervisory authority is the President of Personal Data Protection Office (*Prezes Urzędu Ochrony Danych*); contact details can be found on the official website www.uodo.gov.pl.

VI. DATA SUBJECT RIGHTS – DETAILED INFORMATION

Below you will find the description of your rights that you have under the law, and what Valians does to protect those rights:

Data subject right	Description of the right
Right to information	The right of data subject to obtain information related to the processing of his or her data by the controller. The controller fulfils this right by publishing this privacy policy.
Right of access	The right of data subject to obtain a confirmation from the controller, whether his or her personal data is being processed by the controller, as well

	as obtain access to personal data and information about it, according to Articles 13 and 14(1) of the GDPR.
Right to rectification	The right of data subject to obtain from the controller without undue delay the rectification of inaccurate data concerning him or her. Taking into account the purposes of data processing, the data subject has the right to rectify inaccurate data, including by the means of presenting additional statement.
Right to erasure	The right of data subject also described as ‘right to be forgotten’. In cases indicated in Article 17(1) of the GDPR (e.g. data is no longer necessary for the purposes they were collected or otherwise processed), the data subject has the right to request the erasure of his or her data, and the controller has the obligation to erase such data without undue delay. Nevertheless, there are certain exceptions to this right, set forth in Article 17(3) of the GDPR (e.g. further processing of data is necessary for ascertaining, inquiring, or defending against claims).
Right to restriction of processing	The right of data subject to request restriction of the processing from the controller in cases indicated in Article 18 (1) of the GDPR (e.g. in a case of questioning the accuracy of personal data by the data subject – for the period allowing the controller to verify the accuracy of data). In such case, the controller is allowed to process this data, with exception to storing, only upon the consent of data subject for the purposes of ascertaining, inquiring, or defending against claims, or for the purposes of protecting the rights of another natural or legal persons, or with regard to important matters of European Union or member state’s public interests.
Right to data portability	The right of data subject 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 and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is carried out by automated means and the processing is based on consent or on a contract.
Right to object to processing	The right of data subject to object at any time – due to 1) exceptional circumstances - to the processing of his or her personal data where the processing is necessary for the completion of

	task carried out in public interest or 2) for the purposes of legitimate interests pursued by the controller, such as direct marketing of controller's products and services.
Right to withdraw consent	The right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing conducted before the withdrawal of consent.
Right not to be subject to individual decision-making	The right of data subject 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. This provision does not apply to cases indicated in Article 22(2) of the GDPR (e.g. when the processing is based on conspicuous consent of data subject).
Right to lodge a complaint with a supervisory authority	The right of data subject to lodge a complaint with a supervisory authority, in particular in the member state of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the provisions of the GDPR.

VII. DATA PROTECTION MEASURES

Controller uses technical and organizational measures aimed to protect personal data against destruction, loss, modification, unauthorized disclosure, or unauthorized access.

Measures introduced by Valians include in particular:

- only authorized employees are permitted to access to personal data;
- training of Valians' personnel on the protection of personal data;
- maintaining appropriate physical, electronic and procedural safeguards in connection with the processing of personal data to ensure in particular confidentiality and integrity of any personal data;
- introducing safety procedures;
- encrypting the connections using the SSL data transmission protocol.

VIII. DATA TRANSFERS TO THIRD COUNTRIES

Valians does not transfer your personal data outside the European Economic Area (EEA). If it is necessary to transfer your personal data to third countries, meaning – outside the European Economic Area, Valians will transfer your data only to those countries, in relation to which the European Commission decided it ensures an adequate level of protection (e.g. Privacy Shield program, about which you can find out more <https://www.privacyshield.gov/Program-Overview> or based on standard contractual clauses adopted by the European Commission (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

or based on binding corporate rules (more information available https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules_en

IX. FINAL PROVISIONS

1. All remarks and suggestions regarding this document shall be sent to the following address: valians@valians-international.com.
2. In the matters not covered by this document, the provisions of the laws of Poland, as well as provisions of the GDPR, shall apply.