

INFORMATION CONCERNING THE PROCESSING OF PERSONAL DATA IN

**Kancelaria Radców Prawnych Wiatr i Partnerzy
and**

Kancelaria Radcy Prawnego Rafał Wiatr

for Employees/Contractors of the Law Firm's Clients

In accordance with the obligation under Article 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council, also called the General Data Protection Regulation, hereinafter referred to as "the GDPR", we inform about the objectives and time periods of processing by Kancelaria Radców Prawnych Wiatr i Partnerzy and Kancelaria Radcy Prawnego Rafał Wiatr your personal data, as well as the categories of recipients of the data and rights to which you are entitled in connection with the processing of your personal data. At the same time, we would like to inform you that the scope of information provided meets the requirements resulting from the GDPR.

1. The Controllers of your personal data are:

a) Kancelaria Radców Prawnych Wiatr i Partnerzy with its registered office in Wrocław at ul. Legnickiej 21a/4, entered into the register of businesses of the National Court Register under reference number: 0000346156 by the District Court for Wrocław-Fabryczna, 6th Commercial Division of the National Court's Register

and

b) Kancelaria Radcy Prawnego Rafał Wiatr, ul. Legnickiej 21a/4, 53-671 Wrocław, NIP: 7511060567, which on the basis of the Agreement are joint controllers within the meaning of Article 26(1) of the GDPR.

Controllers are hereinafter jointly referred to as the "Law Firm".

2. The Controllers have established a common contact point in the form of the Data Protection Officer. In matters related to data processing you can contact him via e-mail: IOD@wiatr.wroc.pl

3. Your personal data is processed only for specific, explicit and legally justified purposes. If we intend to process your personal data for other purposes - not indicated below - you will be informed separately about this new purpose. Your personal data will only be stored for the time necessary for the purposes indicated.

4. We process your personal data:

- a) on the basis of article 6.1.f of the GDPR - the processing of data is necessary for the performance of the contract, which is a legitimate interest of the controller,
- b) in order to keep records of cooperation, which is the obligation of the Law Firm., processing is necessary to fulfill the legal obligations incumbent on the Administrator (Article 6.1.c of the GDPR);
- c) for the purpose of keeping the cooperation documentation if it requires the implementation of internal rules, policies, procedures, regulations, instructions in force in the Law Firm, which is the realization of the Controller's legitimate interest in the management of the enterprise (Article 6.1.f of the GDPR);
- d) for archival (evidential) purposes being the realization of the Law Firm's legitimate interest, including securing information in case of a legal need to prove facts (Article 6.1.f of the GDPR);
- e) for the purposes of establishing, investigating or defending against claims which are the realization of the Law Firm's legitimate interest (Article 6.1.f of the GDPR).

5. Assessing whether the indicated objectives are justified, we take into account, among others, the following:

- a) any relationship between the purposes for which personal data were collected and the purposes of the intended further processing,
- b) the context in which personal data were collected, in particular the relationship between the data subjects and the Law Firm,
- c) the nature of personal data,
- d) possible consequences of the intended processing,
- e) the existence of adequate safeguards.

6. Until the legitimate interests of the Law Firm constituting the basis for such processing have been fulfilled or until an objection to such processing has been raised, no longer than until the end of the calendar year in which the 10-year limitation period expires. In the event of a dispute or proceedings, in particular court proceedings, the period of storage shall be counted from the date of the dispute or the legally valid termination of proceedings.

After the processing is completed, data will be destroyed.

7. The Law Firm processes your personal data obtained from your employer / principal. In each of the cases indicated, the Law Firm scrupulously verifies whether it has a legal basis for processing personal data.

8. The Law Firm may process in particular the following categories of personal data obtained by the Law Firm from your employer / principal:

- a) personal data (e.g. name and surname, position)

- b) contact details (e.g. telephone number),
- c) identification data (e.g. identity card number, PESEL no.),
- d) audio-visual data (e.g. data related to image recording for security and evidence purposes).

9. The access to your personal data - within the organizational structure of the Law Firm - shall be granted only to the associates authorized by the Law Firm and only to the necessary extent. In certain situations your personal data may be disclosed by the Law Firm to recipients outside the structure of the Law Firm to the extent not covered by professional secrecy. Always in such a situation we thoroughly examine the legal basis for disclosing personal data. The recipient of the data within the meaning of the GDPR may be both the entity which processes personal data on behalf of the Law Firm and the entity to which the data are made available for its own purposes (e.g. public administration bodies).

10. The recipients of your personal data may be:

- a) public bodies, institutions or third parties entitled to demand access or receive personal data on the basis of legal regulations, e.g. the Polish Financial Supervision Authority, Ministry of Finance, General Inspector of Financial Information, Tax Office,
- b) entities to whom the Law Firm has entrusted the processing of personal data on the basis of concluded agreements, e.g. IT providers, archiving companies and contractors for other services processing data on behalf of the Law Firm,
- (c) entities providing advisory and control services such as audit firms,
- (d) entities processing data for the purpose of subcontracting the conduct of legal representation, such as other law firms,
- g) entities to whom the transfer of data is necessary for the performance of a specific activity in connection with the performance of a contract between the Law Firm and your employer/principal, provided that the data is not covered by professional secrecy

11. Your personal data will not be transferred to a third country or any international organization.

12. Below you will find information about your rights in connection with the Law Firm's processing of your personal data:

- a) You have the right to access your personal data, including obtaining a copy of the data;
- b) if you consider your personal data processed by the Law Firm to be inaccurate, you have the right to correct or supplement them,
- c) you have the right to request the deletion of your personal data in cases provided by law,
- d) you have the right to request a restriction on the processing of your personal data,

e) you have the right to object to the processing of your personal data in case they are processed in order to realize a legitimate interest of the Law Firm,

f) you also have the right to receive from the Law Firm your personal data in a structured format and to transfer your personal data to another administrator. In case of data transfer, due to other legal regulations, it may be required to obtain your or another person's consent or fulfil other conditions required by those regulations,

13. Providing your personal data by your employer / principal is necessary to implement the agreement between your employer / principal and the Law Firm.

14. In cases when the Law Firm considers that the processing of your personal data by the Law Firm violates the provisions of the Regulation, you have the right to lodge a complaint with the Chief of the Office for Personal Data Protection.

15. We will not make decisions against you based solely on automated processing, including profiling.