

# Privacy Policy

Hartika Spółka z ograniczoną odpowiedzialnością makes every effort to ensure the safety and confidentiality of your personal data. We employ appropriate measures to secure your personal data, including suitable protection during the course of planning all new forms of activities. Furthermore, in order to minimise risks we do our utmost to limit the scope of personal data we obtain.

The aim of this policy is to inform interested parties on the purposes, scope and categories of processed personal data, processing period as well as the relevant rights pursuant to 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 (GDPR) which entered into force on 25 May 2018.

## The Controller

The Controller of your personal data is:  
 HARTIKA Spółka z ograniczoną odpowiedzialnością with its registered office in Białystok,  
 ul. Branickiego 17A/106, 15-085 Białystok. Poland.

As the Controller we are responsible for ensuring personal data security and for compliance with the regulations as in force at present in terms of the use thereof. If you have any questions of queries please contact us on [rodo@hartika.com](mailto:rodo@hartika.com) or by post to our company address.

## Data safety

In order to guarantee personal data security, we have carried out a risk assessment in terms of the suitable safeguards.

Data are processed in accordance with the law and best market practices within this scope. Furthermore, please note that the data obtain by us are not transferred outside of the European Economic Area.

## Categories of the collected personal data

In conjunction with our operations, we process personal data collected in the following areas:

<b>Data of our counterparties and commercial partners</b>	Hartika, as the processor of personal data obtained within the scope entering into commercial agreements, only processes the said data during the term of the aforementioned agreements and to ensure appropriate cooperation. The data are processed according to terms specified in the agreements.
<b>Data of <a href="http://hartika.com">http://hartika.com</a> website visitors</b>	The collected data comprise cookie files, used for statistical analyses and ensure correct website operation.

	Cookie files expire 12 months after the last visit to the website.
<b>Data of forwarding companies and drivers performing delivery services for the benefit of Hartika</b>	We process these data to ensure smooth operation of the supply chain and to handle logistics processes. This information is necessary to schedule shipments and deliveries.
<b>Data of tenderers and of their employees</b>	We process these data for the purpose of carrying out tender proceedings or to provide quotes, to conclude and execute agreements. The data storage period depends on the requirements according to the agreement financing sources.
<b>Data of owners or authorised representatives of entities performing services contracted by Hartika (counterparties)</b>	We process data in order to execute and settle agreements and to satisfy legal requirements, in particular those stemming from the Accounting Act of 29 September 1994. The data storage period depends on the requirements according to the agreement financing sources.
<b>Information about our employees and candidates</b>	Data pertaining to job candidates are processed on the basis of the candidates' consents during the recruitment period. We process data in order to satisfy statutory requirements and for a period stemming from the Labour Code of 26 June 1974.
<b>Data of trainees and apprentices</b>	We process these data in order to perform work placement / internship agreements for a period as required by the Accounting Act as well as tax regulations and those pertaining to social insurance.

Personal data may be provided to the following data recipient categories: public authority bodies and entities engaged with the performance of public tasks or acting upon instructions by public authority bodies, within the scope and for purposes as set forth by the provisions of law, entities providing services necessary for Hartika's operations, including IT partners, entities delivering technical or organisational support.

### **Rights of persons within the scope of personal data**

At every stage of data processing by Hartika, you have the right to:

- i. access to your data, obtain information about the scope within which we process data and to obtain copies thereof,
- ii. modify and edit your data as long as there are no other legal premises preventing the restriction of the processing of your data
- iii. complete erasure of your data ("the right to be forgotten") as long as there are no legal grounds to the contrary
- iv. not to be subject to automated decisions based on profiling
- v. object to inappropriate processing of personal data (including to withdraw the consent)
- vi. to transfer the data to another Controller, as long as the data are processed in conjunction with a given consent or concluded agreement.

In order to ensure correct handling of your inquiries and due diligence of this process, we have prepared a form which you can use to request the exercise of your rights. The form can be found hereinbelow.

You can submit completed forms in person or by post to our registered address or by e-mail to [rodo@hartika.com](mailto:rodo@hartika.com): please send your request signed electronically or a scan of a signed document. The data shall not be processed for any other purposes except for those associated with the submitted request and shall not be stored unless already saved in filling systems.

Each submitted request shall be considered individually pursuant to the regulations as in force at present.

Please keep in mind that exercising a given right may depend on the legal basis applicable in the given data processing purpose.

Requests shall be handled without undue delay, within no more than a month after their receipt, nevertheless it is possible that on account of the nature of a given request, we shall not be able to process it within this deadline. In such circumstances you will be informed of the delay and the causes thereof. Analogously we shall inform you of the reasons for rejecting your request if such comes to pass.

Please note that the first request shall be handled without any fees or charges, however, if we receive groundless requests or an excessive number of requests, we reserve the right to charge a fee for providing information. We shall inform you without undue delay of the fee amount as well as the reasons for which we are unable to act upon your request, if such occurs.

Additionally, in order to guarantee the safety of provided information, in a situation where we are unable to satisfactorily identify you as the person authorised to receive data, we reserve the right to change the manner in which information is handed over. We shall inform you if such circumstances occur.

### **Additional information**

You also have the right to submit a complaint pertaining to the processing of personal data to the President of the Data Protection Office (PUODO).

The principles referred to herein apply as of 10<sup>th</sup> May 2020 until further notice and right the legal requirements specified in GDPR Articles 13 - 14.

We reserve the right to amend them.

**To: Hartika Spółka z ograniczoną odpowiedzialnością**  
**PL 15-085 Białystok, ul. Branickiego 17A/106, Poland**  
**e-mail: rodo@hartika.com**

**REQUEST**  
**TO EXERCISE RIGHTS PURSUANT TO RESOLUTION 2016/679 (GDPR)**

Complete the form legibly (capital letters) and place an X in the correct square (select an option).

**INFORMATION ON PERSON SUBMITTING THE REQUEST**

A. Additional information to identify the person submitting the request (place an X in appropriate squares):

1.  Hartika Sp. z o.o. customer
2.  former / current Hartika Sp. z o.o. employee
3.  person with whom Hartika Sp. z o.o. had at any time entered into a civil-law agreement: contract for mandate, specific task contract
4.  third party

B. Personal details

Name/names \_\_\_\_\_

Surname \_\_\_\_\_

NIP number \_\_\_\_\_

C. Contact details:

Correspondence address

Street name \_\_\_\_\_

House number \_\_\_\_\_

Flat number \_\_\_\_\_

Town \_\_\_\_\_

Post code \_\_\_\_\_

Telephone number \_\_\_\_\_

E-mail \_\_\_\_\_

**REQUEST CONTENT**

D. Form of request response / performance

- 1.  request response / performance in paper form, sent to the correspondence address
- 2.  request response / performance in electronic form, sent to the e-mail address

E. Type of requested information:

- 1.  the right to information (information obligation)
- 2.  withdrawal of marketing information consent
- 3.  rectification of data (please indicate the type of personal data subject to rectification or update and provide documents confirming the request or submission of an additional declaration):

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- 4.  copy of the customer's personal data subject to processing by the company (please specify the scope of documents / information which are to be prepared):

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- 5.  data eradication
- 6.  restriction of processing
- 7.  transfer of data (please provide contact details for the new Controller):

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- 8.  objection (please specify which processing purpose you are objecting to):

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**Signature** \_\_\_\_\_

**Town:** \_\_\_\_\_

**Date:** \_\_\_\_\_