

## PRIVACY POLICY

This Privacy Policy defines the principles of personal data processing by the Data Controller - GRUPA MASPEX Sp. z o.o. with registered office in Wadowice and it contains the Cookie Policy.

### I. Definitions

**Data Controller/Website administrator** - **GRUPA MASPEX Sp. z o.o.** with its registered office in Wadowice, address: 34-100 Wadowice, Legionów 37 St., entered in the register of companies of the National Court Register under the number KRS 0000898248, whose registration files are kept by the District Court for Kraków - Śródmieście in Kraków, 12th Commercial Division of the National Court Register, VAT No (NIP) number: 5512617657, statistical ID (REGON): 122948517, BDO: 000012154, share capital: 2 988 781 500,00 PLN.

#### Contact details:

**Correspondence address:** GRUPA MASPEX Sp. z o.o., Legionów 37 Street, 34-100 Wadowice.

**E-mail address:** [maspex@maspex.com](mailto:maspex@maspex.com).

**Personal data** – all information about a natural person, who is identified or identifiable by means of one or more specific factors determining physical, physiological, genetic, psychic, economic, cultural or social identity, including IP of a device, localisation data, internet identifier and information gathered via cookie files and other similar technologies.

**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.

**Company from the Data Controller's Group** – a company economically and/or capitally and/or personally related to the Data Controller.

**User** – every natural person visiting the Website and/or using computer communicators (for example chatbots).

**Counterparty** – a natural person, who contacts the Data Controller and/or a Company from the Data Controller's Group in order to undertake activities aimed at entering into agreement/cooperation and/or executing an agreement/cooperation.

**Contact Person** – a natural person appointed by the Contractor as the Contractor's contact person for cooperation with the Data Controller and/or a company from the Data Controller's group and/or under execution of an agreement concluded by the Contractor with the Data Controller and/or a company from the Data Controller's group, as the Contractor's associate and/or a person used by the Contractor to perform an agreement concluded with the Data Controller and/or a company from the Data Controller's group or the Contractor's subcontractor under an agreement or cooperation with the Data Controller and/or a company from the Data Controller's group, or in connection with the fact that you have been appointed as a person representing the Contractor in order to sign

and conclude an agreement with the Data Controller and/or a company from the Data Controller's group.

**Website** – any website/social networking site/application on which this Privacy Policy is posted or to which this Privacy Policy is linked.

## **II. Personal data processing**

### **1. Principles of Personal data processing**

**If you have not received another information clause on Personal data processing from a Company from the Data Controller's Group, your Data Controller is: GRUPA MASPEX Sp. z o.o. with registered office in Wadowice, Legionów 37 Street, 34-100 Wadowice and the principles of Personal data processing by the Data Controller are described in this Privacy Policy.**

Personal data are processed in compliance with respective applicable provisions of GDPR.

The Data Controller applies technical and organisational means ensuring security of Personal data processing and protection of Personal data against their disclosure to unauthorised persons, their acquisition by unauthorised persons, processing in breach of respective legal provisions on personal data protection and their change, loss or destruction.

Personal data collected on the Website in the form of cookies may be profiled by the Data Controller in the cases indicated in point 3 letter f) below.

### **2. Processing of Personal data outside the European Economic Area**

Pursuant to the legal requirements, we would like to inform you that due to the need to ensure the highest possible level of IT services, including personal data security, IT service providers outside the European Economic Area ("EEA") may have access to personal data. The level of personal data protection outside the EEA differs from that provided by European law. For this reason, the Data Controller ensures that the above-mentioned IT service providers have access to personal data only to the extent necessary for the performance of their services (including maintenance) and ensuring an adequate level of protection, primarily through:

- a) cooperation with entities in countries for which a relevant adequacy decision of the European Commission has been issued regarding the assurance of an adequate level of personal data protection;
- b) the use of standard data protection clauses adopted by the European Commission.

In the above-mentioned case, you have the right to obtain a copy of the information on the security measures applied by contacting the Data Protection Officer.

### **3. Personal data processing**

The Data Controller may process Personal data for the following purposes:

- a) for the purpose of communication, identification and replies to User's inquiries via the Website**

The User has the possibility to contact the Data Controller by means of electronic contact forms available on the Website. To be able to use the form, a User is required to provide Personal data necessary for contact with the User and for reply to an inquiry. In the contents of an inquiry, the User may also provide other data to facilitate contacts or handling of an inquiry.

Personal data are processed for the above mentioned purpose on the basis of the User's consent, that is article 6 sec. 1 letter a of GDPR. The User's Personal data will be processed for a period necessary for a reply to an inquiry to be given or until the consent for the processing of Personal data is withdrawn.

In the event of using other, dedicated forms available on the Website - e.g. the Form for Suppliers or the Complaint Form - the legal grounds for processing are each time indicated in the information on the processing of Personal data contained in this form.

**b) for the purpose of communication, identification and replies to User's inquiries via other forms of contact**

In case of contact via general e-mail addresses or phone numbers to secretariats of the Data Controller and/or Companies from the Data Controller's Group, as well as e-mail addresses or phone numbers of other departments available on the Website, the Data Controller processes personal data in order to facilitate contacts and provide a reply to an inquiry.

Personal data are processed for the above mentioned purpose on the basis of the legitimate interest of the Data Controller, that is article 6 sec. 1 letter f of GDPR. The User's Personal data will be processed for a period necessary for a reply to an inquiry to be given or until an objection to the processing of Personal data is raised in the legitimate interest pursued by the Data Controller.

**c) to handle complaints**

If a complaint about the Products from the offer of the Data Controller is lodged via:

- a) electronic contact forms or via functionalities available on the Website;
- b) general e-mail addresses or phone numbers to secretariats of the Data Controller and/or Companies from the Data Controller's Group;
- c) stores,

Data Controller processes Personal data for purpose of examination of a complaint.

Personal data are processed on the basis of fulfilment of a legal obligation, that is article 6 sec. 1 letter c of GDPR and the legitimate interest of the Data Controller, that is article 6 sec. 1 letter f of GDPR meaning the pursuit of possible claims of the Data Controller and/or Companies from the Data Controller's Group and defence against such claims. Personal data will be processed for a period necessary for examination of a complaint, period of limitation of claims under complaints and a period necessary for protection against claims of a claimant.

**d) for the purpose of direct marketing**

The Data Controller may process Personal data for the purpose of the Data Controller or Companies from the Data Controller's Group marketing or direct marketing of the products included in the commercial offer of the Data Controller (hereinafter: the Products). The current list of Products is published on website: [www.maspx.com](http://www.maspx.com).

The processing of Personal data for the purpose of direct marketing may also take place via public profiles on social networking sites, including Facebook, Twitter, LinkedIn, TikTok, Instagram, Snapchat, Pinterest, administered by the Data Controller and/or Companies from the Data Controller's Group. Personal data processed in these profiles is primarily the data of people visiting profiles, to which the Data Controller has access, inter alia, as part of comments, likes, online identifiers or as part of any interaction between a profile visitor and Data Controller, Company from the Data Controller's Group and/or the entity to which the Data Controller and/or the Company from the Data Controller's Group commissioned the service of the above-mentioned profiles.

The purposes of processing Personal data are to enable visitors to be active on profiles, effectively run profiles by providing visitors with information about initiatives, activities, events, services or products, as well as statistical and analytical activities using the possibilities provided by the suppliers of the above-mentioned social networking sites.

Personal data as part of the LinkedIn profile may also be processed in order to conduct an effective recruitment policy by the Data Controller by using the option of direct messages to users with public profiles in the above-mentioned website in order to present them with current job offers and for contact purposes in connection with the offers sent.

The legal basis for the processing of Personal data for the above purposes is the legitimate interest of the Data Controller consisting in promoting the Data Controller and/ or Companies from the Data Controller's Group and products from its offer, as well as improving the quality of services provided or conducting an effective recruitment policy that is article 6 sec. 1 letter f of GDPR. Personal data will be processed until the realization of the legitimate interest pursued by the Data Controller or until an objection to the processing of Personal data is raised in the legitimate interest pursued by the Data Controller.

If the Personal data is processed via chatbot computer programs used to communicate and promote products from the offer of the Data Controller, the User's Personal data is processed on the basis of his consent - i.e. article 6 sec. 1 letter a of GDPR. Personal data in chatbot computer programs will be processed for the period of availability of this program for Users or until the withdrawal of consent by the User.

In the case of processing of Personal data in competitions and other promotional actions organized on the profiles of the above-mentioned social networking sites, the principles of Personal data processing are each time described in the regulations of a given competition or promotional action.

The above information constitutes only the principles of Personal data processing by the Data Controller in the framework of the conducted profiles in social networking sites. The rules of processing of Personal data by the providers of the above-mentioned social networking sites are available on the websites of those providers.

**e) to undertake activities aimed at entering into an agreement/cooperation and or/execution of an agreement/cooperation**

The Data Controller may receive Personal data of Counterparties directly from Counterparties or from a Company from the Data Controller's Group, with whom the Counterparty cooperates and/or has entered into an agreement, and in case of Personal data of Contact Persons – directly from such persons, the Counterparty of a Company from the Data Controller's Group, with whom the Counterparty cooperates and/or has entered into an agreement.

The Data Controller may process the following Personal data of Counterparties/Contact persons, the scope of which is each time conditioned by cooperation or a concluded agreement: name and surname, position, address of registered office/place of business activity, another specified address, phone number, e-mail address, NIP (tax identification number), PESEL (Polish resident identification number), identity document number, driving licence number, registration number of a vehicle or other data necessary for conclusion and/or execution of an agreement/cooperation.

Above mentioned Personal data will be processed only in the scope necessary for conclusion/execution of an agreement and in compliance with the principle of adequacy.

Disclosure of Counterparties' Personal data is a necessary condition for conclusion and execution of an agreement and/or commencement of cooperation, and in case of Contact Persons it is voluntary.

The Data Controller processes Personal data of Counterparties and/or Contact Persons for the purpose and for the period of:

- 1) Personal data of Counterparties: the purpose for conclusion and execution of an agreement, that is pertaining to article 6 sec. 1 letter f of GDPR, Personal data will be processed for duration of cooperation and/or an agreement;
- 2) Personal data of Contact Persons: the purpose for execution of cooperation/agreement concluded with a Counterparty, in particular for the purpose of contact, that is in legitimate interest of the Data Controller and/or Companies from the Data Controller's Group - article 6 sec. 1 letter f of GDPR, Personal data will be processed for duration of cooperation and with a Counterparty/or a term of an agreement concluded with a Counterparty;
- 3) Personal data of Counterparties and/or Contact Persons: implementation of business and administrative purposes related to running a business, that is for the purpose related to the legitimate interest of the Data Controller and/or the Companies from the Data Controller's Group - article 6 sec. 1 letter f of GDPR; Personal data will be processed for the period necessary for the Data Controller to achieve the above purposes or until an objection to the processing of Personal data is raised in the legitimate interest pursued by the Data Controller;
- 4) Personal data of Counterparties and/or Contact Persons: for pursuit of possible claims by the Data Controller and or a Company from the Data Controller's Group in relation to default under an agreement/cooperation and/or wrongful acts, as well as for defence against such claims, that is in legitimate interest of the Data Controller and/or a Company from the Data Controller's Group, that is article 6 sec. 1 letter f of GDPR, Personal data will

be processed for duration of cooperation/a term of an agreement and a period equal to the period of limitation of possible claims in relation to default under an agreement/cooperation and/or wrongful acts;

5) Personal data of Counterparties and/or Contact Persons for maintenance of ledgers and other accounting documents, that is in legitimate interest of the Data Controller and/or a Company from the Data Controller's Group, that is article 6 sec. 1 letter f of GDPR, Personal data will be processed for a periods required by the legal provisions that impose specific obligations entailing Personal data processing;

6) Personal data of Counterparties and/or Contact Persons: for marketing purposes, that is for the purpose of presentation of commercial offers and information on products included in the offer of the Data Controller, that is in legitimate interest of the Data Controller, that is article 6 sec. 1 letter f of GDPR, Personal data will be processed until objection to Personal data processing for marketing purposes is raised.

**f) for the purpose of adjustment of the contents of the Website to preferences of the User and communication with the User, optimisation of use of the Website, for the purpose of generation of statistics, presentation of personalized content on the Website adjusted to User's preferences and interests, personalization and presentation of advertisements displayed on other sites, applications, websites, introduction of questionnaires and detection of bots and abuse in services of analysis of marketing tool operations and ensuring the safe use of the Website.**

Processing of the User's Personal data for above purposes will be necessary for purposes related to the legitimate interest of the Data Controller, that is to ensure correct operation of the Website and perform promotional and marketing activities, include to take account of the characteristics of recipients in performed activities, and to protect the Website against attempts of illegal interference with the Website, e.g. attempts to hack the Website by unauthorised persons, that is article 6 sec. 1 letter f of GDPR. Personal data will be processed until a data subject raises an objection, due to reasons related to his particular situation, to processing of his personal data, including for marketing purposes.

The Data Controller achieves the above purpose by means of, for instance, cookie files that are described in detail in Chapter III – Cookie Policy.

#### **4. Recipients of Personal data**

Personal data may be disclosed:

- a) in the scope specified in clause 3 letters a and b to authorised employees and associates of the Data Controller, the Website Administrator and its authorised staff, a Company from the Data Controller's Group, who – due to the scope of his activities is competent to reply to an inquiry, entities that render services, including maintenance and technical support servers for applications, computer programmes, IT systems and the Website, where Personal data are processed, entities authorised to receive Personal data by law,
- b) in the scope specified in clause 3 letter c to authorised employees of the Data Controller, persons authorised by the Data Controller, associates of the Data Controller, Companies from the Data Controller's Group that are producers and/or distributors of advertised products and their authorised staff; Companies from Data Controller's Group that have received a complaint and their authorised staff; insurers, insurance brokers, entities

rendering marketing services that cooperate with the Data Controller and/or entities appointed by the Data Controller for handling of a complaint, state authorities, if such obligation is imposed by law;

c) in the scope specified in clause 3 letter d: to Companies from the Data Controller's Group and their authorised staff; marketing, advertising agencies, media houses cooperating with the Data Controller or a Company from the Data Controller's Group, entities that render services for the Data Controller (Companies from the Data Controller's Group), in particular entities that render IT services, entities rendering transportation, postal, courier, consulting services and supporting the Data Controller (Companies from the Data Controller's Group) in pursuit of claims, in particular: law offices, tax offices, debt collection companies, auditors, insurers, insurance brokers and authorised employees or associates of the above mentioned staff;

d) in the scope specified in clause 3 letter e to authorised employees and associates of the Data Controller, Companies from the Data Controller's Group and their authorised staff, entities that render services for the Data Controller and/or a Company from the Data Controller's Group, including entities used by the Data Controller and/or a Company from the Data Controller's Group to perform an agreement, in particular entities that render IT services, entities rendering transportation, postal, courier, consulting and supporting services for the Data Controller and/or a Company from the Data Controller's Group in pursuit of claims, in particular: law offices, tax offices, debt collection companies, auditors, insurers, insurance brokers and authorised employees of the above mentioned entities; entities authorised to receive Personal data under generally applicable legal provisions;

e) in the scope specified in clause 3 letter f to the Companies from the Data Controller's Group and their authorised staff, service providers, including maintenance and technical support services for applications, computer programmes, IT system and the Website, where the Personal data are processed, partners of the Data Controller and/or a Company from the Data Controller's Group.

## **5. Rights related to Personal data processing**

A data subject has the right to:

- a) review the contents of Personal data;
- b) rectify their Personal data;
- c) delete their Personal data;
- d) restrict processing of Personal data,
- e) right to demand a transfer of Personal data.

A data subject has a right to lodge a complaint on Personal data processing to a supervisory authority, which in Poland is the Chairperson of the Personal Data Protection Office.

If Personal data are processed by the Data Controller for the purpose of execution of a legitimate interest of the Data Controller or a third party, a data subject may raise an objection to processing of their Personal data due to reasons related to their particular circumstances.

If Personal data are processed for the purpose of marketing, including the marketing of products from the offer of the Data Controller, data subject may raise an objection to processing of their Personal data for marketing purposes.

If Personal data processing is based on consent, a data subject concerned may withdraw the consent on Personal data processing without impact on legitimacy of processing on the basis of such consent before its withdrawal.

The above mentioned rights may be exercised only in compliance with respective provisions of GDPR.

In case of submission of a request related to exercising of rights related to processing of Personal data, Personal data will be processed for the purpose of examination of a request and documenting of its handling. The legal ground of processing consists of the legitimate interests of the Data Controller that is a need to examine a request and ensure accountability in relation to its examination, that is article 6 sec. 1 letter f of GDPR. Personal data will be processed for a period enabling execution of such interest or until an effective objection is raised to Personal data processing for the above mentioned purpose.

The **Data Protection Officer** shall be the contact person of the Data Controller in all issues related to Personal data processing, also for the purpose of exercising of all foregoing rights:

Contact details of the Data Protection Officer:

**Correspondence address:**

**Data Protection Officer**, Chopina 10 Street, 34-100 Wadowice

For marketing purposes: **iodmarketing@maspex.com**

Product complaints: **iodreklamacje@maspex.com**

For Counterparties/Contact Persons: **iod@maspex.com**

For the purpose of contact: **iodkontakt@maspex.com**

### **III. Cookie Policy**

Cookie files are used for rendering of highest quality services, including in the way adjusted in to individual needs. If you use the website without change of cookie settings, cookies will be placed in the terminal equipment. Cookie settings may be changed any time.

Cookies files are IT data, in particular text files that are stored in the terminal equipment of a Website user and used when websites are used. Cookie files usually contain the name of a website, from which they come from, period of their storage on the terminal equipment and data assigned to them (such as e.g. a unique number).

Besides the Data Controller or the Companies from the Data Controller's Group, also entities cooperating with the Data Controller, such as Partners rendering analytical services, advertisers, authors of applications, chain advertising agencies may place and use information in user's terminal equipment and.

The Website may place cookie files in a browser if it enables such function. What is important, a browser makes it possible for the Website to access only the cookie files that were placed by that website, and not files placed by other websites.

Due to life cycle of cookie files, the website uses two major types of files:

- session files – temporary files stored in the User's terminal equipment until a User logs out, leaves the Website or switches off the software (internet browser);
- permanent files – stored in the User's terminal equipment for a definite duration specified in the parameters of cookie files or until they are deleted by the User.

Due to the purpose of cookies files, the Website uses the following types of them:

- necessary for operation of the Website - enabling use of the Website, e.g. cookies allowing to maintain session of the User and in case of Website which requires login also e.g. authentication cookies;
- used for ensuring security, e.g. used for detection of bots and abuse of services;
- performance files - enabling collection of information on the manner, in which Website is used;
- functional – enabling to adjust the content of the Website to the User's preferences and to optimize the use of the Website, e.g. making it possible to "remember" the settings selected by the User and to personalize the User's interface, e.g. with respect to the selected language or region from which the User comes from, font size, appearance of the website and applications,
- advertising – enabling presentation on the Website of personalized content tailored to the User's preferences and interests, personalize the advertisements displayed on other pages, applications, websites;
- statistical – used for calculation of statistics related to Website.

In numerous cases the software used for browsing of website (a browser) allows storage of information in form of cookie files in the User's terminal equipment as default settings. But the User may change such settings any time. If not, it means that the above mentioned information may be placed and stored in their terminal equipment, and at the same time the Website will store information in the User's terminal equipment and obtain access to such information.

Cookie files may be managed by the User on their own on the level of a browser used by the User.

The most popular browsers offer, for instance, the possibility to:

- accept handling of cookie files, which makes it possible for the User to fully use options offered by websites;
- manage cookie files on the level of single websites selected by the User;
- determine settings for various cookie files, e.g. accept permanent files as session files, etc.;
- block or delete cookie files.

Comprehensive information is available in software (browser) settings or in section help in a browser menu. Restrictions or exclusion of cookie files and other similar technologies may have impact on some functionalities available in our Website.

The list of Partners that may have access to cookies files, together with a link to principles of use of cookie files applied by the Partner:

<https://www.facebook.com/policies/cookies/>  
<https://help.twitter.com/en/rules-and-policies/twitter-cookies>  
<https://yandex.com/legal/privacy/>  
<https://policy.pinterest.com/en/privacy-policy>  
<https://support.google.com/analytics/answer/7667196>  
<https://www.cloudflare.com/security-policy/>  
[https://kwit.pl/polityka\\_prywatnosci](https://kwit.pl/polityka_prywatnosci)  
<http://www.listonic.com/content/pl/polityka-prywatnosci/>

#### **IV. Amendment of the Privacy Policy**

The Privacy Policy is verified on ongoing basis and updated, when necessary.