

PRIVACY POLICY

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II. DEFINITIONS

Controller/Us - The Controller of your personal data is Trend Glass sp. z o. o. with its seat in Radom, ul. Marii Fołtyn 11, 26-600 Radom entered in the Register of Entrepreneurs of the National Court Register kept by the District Court Lublin-Wschód in Lublin with its seat in Świdnik, VI Commercial Department of the National Court Register under KRS number: 0000164723, NIP (Tax Identification Number): 9482304802, REGON (Business Registration Number): 672911706, share capital of PLN7,155,000;

Policy - this document, that is, the Privacy Policy;

Terms - the Terms and Conditions concerning provision of services by electronic means by Trend Glass sp. z o. o. with its seat in Radom, available at the website: www.trendglass.pl;

GDPR - the 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);

Personal Data/Data - information that identifies you or makes you directly or indirectly identifiable with this information, e.g. first or last name, phone number, email address, job title;

Website - the website run by the Controller at the following address www.trendglass.pl.

III. INTRODUCTION

We ensure that your Personal Data is processed in accordance with universally applicable laws.

Transparency of our operations is also important to us and that is why we have compiled the most important information regarding our processing of Personal Data in this Policy.

We collect and process Personal Data in accordance with the principles set out in the GDPR, i.e. lawfully, fairly and transparently. We process data to the least extent necessary, and for specific, explicit and legitimate purposes. We make every effort to keep your Data correct, up-to-date at all times and we only process it for as long as is necessary for specific purpose.

Using appropriate technical and organisational measures, we ensure the security of Personal Data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage.

Only authorized persons have access to processed Personal Data, and only to the extent necessary to perform their tasks.

We also require our subcontractors and contractors who process Personal Data on our behalf to process it in accordance with the law, in particular the GDPR. Third parties are only provided with access to Personal Data under specified basis.

IV. CONTACT WITH THE DATA CONTROLLER

If you have any questions or concerns, in particular about the processing of your Personal Data, you can contact us:

- by mail, writing us at the following address: ul. Marii Fołtyn 11, 26-600 Radom;
- by phone, on business days, 8:00 through 16:00 calling the following number: +48 508-370-827;
- by e-mail, writing a message to the following address: iodo@trendglass.pl.

V. CONTACT WITH THE DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO). You can contact the DPO:

- by mail, writing us at the following address: ul. Marii Fołtyn 11, 26-600 Radom;
- by phone, on business days, 8:00 through 16:00 calling the following number: +48 508-370-827;
- by e-mail, writing a message to the following address: iodo@trendglass.pl.

VI. PERSONAL DATA PROCESSING

a) WHEN YOU CONTACT US BY E-MAIL OR BY TRADITIONAL MAIL

The purposes of data processing and legal basis for personal data processing:

When you contact us by email or by traditional means (letter) and such contact is not related to the services we provide or any other contract, the legal basis for processing your Personal Data is our legitimate interest (Art. 6(1)(f) of the GDPR). It involves communication with you in order to deal with a particular issue. In this case, we only process Personal Data relevant to the matter to which such communication is related. We also process Personal Data for the purpose of a possible defence against claims on the basis of our legitimate interest (Article 6(1)(f) of the GDPR). In this case, our legitimate interest is to defend our rights.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing Personal Data is voluntary and is not a statutory / contractual requirement / condition allowing to enter into a contract. However, failure to provide this Personal Data will prevent us from contacting you and processing your case.

Retention period for Personal Data:

Your personal data will be processed for the time necessary to process the case, and thereafter for the time required by mandatory legal provisions (including the period specified in regulations concerning the limitation of claims) or until you express your objection, whichever occurs first.

b) WHEN YOU CONTACT US BY PHONE

The purposes of data processing and legal basis for personal data processing:

When you contact us by phone and this contact is not related to the services we provide or any other contract, the legal basis for processing your Personal Data is our legitimate interest (Article 6(1)(f) of the GDPR). We will only ask you for Personal Data if it is necessary to process your case. Our legitimate interest is to talk to you in order to process your case. In this case, we only process Personal Data relevant to the matter in question. We also process Personal Data for possible defence against claims on the basis of our legitimate interest (Article 6(1)(f) of the GDPR). In this case, our legitimate interest is to defend our rights.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing Personal Data is voluntary and is not a statutory / contractual requirement / condition allowing to enter into a contract. However, failure to provide this Personal Data will prevent us from contacting you and processing your case.

Retention period for Personal Data:

Your personal data will be processed for the time necessary to process your case, and thereafter for the time required by mandatory legal provisions (including the period specified

by the provisions on the limitation of claims) or until you object whichever occurs first

c) WHEN YOU CONTACT US VIA THE "ASK A QUESTION" FORM

Please do not provide us with Personal Data that is not necessary to process your request.

The purposes of data processing and legal basis for personal data processing:

When you contact us via the "Ask a Question" form, we process your Personal Data entered in the form to respond to your enquiry in the best possible way. The legal basis for the processing is the necessity of the processing to perform the contract - to provide the service in accordance with the Regulations (Article 6(1)(b) of the GDPR).

We also process Personal Data for possible defence against claims on the basis of our legitimate interest (Art. 6(1)(f) of the GDPR). This legitimate interest concerns defending our rights.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing Personal Data is voluntary yet necessary to perform the contract. Failure to provide such Data will prevent us from responding to your enquiries.

Retention period for Personal Data:

Your personal data will be processed for the time necessary to process your case, and thereafter for the time required by mandatory legal provisions (including the period specified by the provisions on the limitation of claims).

d) WHEN CONTACTING US VIA THE "ASK FOR A COMPLETE OFFER" / "ASK FOR A CUSTOMISED PROJECT" FORM

Please do not provide us with Personal Data that is not necessary to process your request.

The purposes of data processing and legal basis for personal data processing:

When you contact us via the "Ask for a Complete Offer" / "Ask for a Customised Project" form, we process your Personal Data in order to respond to your enquiry on the basis of Article 6(1)(b) of the GDPR, i.e. the processing is necessary for the performance of a contract you have entered into or to take action at your request prior to entering into a contract.

We also process your Personal Data to defend against possible claims on the basis of our legitimate interest (Article 6(1)(f) of the GDPR). This legitimate interest concerns defending our rights.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing Personal Data is voluntary yet necessary to enter into a contract. Failure to do so will prevent us from responding to your enquiry. Retention

period for Personal Data:

Your personal data shall be processed for the time necessary to send you the offer and the time you are bound by our offer, and thereafter for the time required by mandatory legal provisions (including the period specified in provisions relating to the limitation of claims).

e) IF YOU ARE OUR COUNTERPARTY OR A REPRESENTATIVE/AGENT OF OUR COUNTERPARTY

The purposes of data processing and legal basis for personal data processing:

If you are our **counterparty (running a sole proprietorship)**, we process your Personal Data for the purpose of entering into and performing a contract (including maintaining communication). The processing of Personal Data is necessary for the performance of a contract you have entered into or to take action at your request prior to entering into a contract (Article 6(1)(b) of the GDPR).

If you are a **representative / agent of a third party** we process your Personal Data in order for you to carry out your duties on behalf of the entity you represent. The processing of Personal Data is carried out on the basis of our legitimate interest (Article 6(1)(f) of the GDPR) which is the need to process Data necessary for the conclusion and performance of contracts entered into with contractors.

If you are our **counterparty (running sole proprietorship) or a representative / agent of a third party**, we also process your Personal Data for the following purposes:

- to initiate contact and maintain business relationship - on the basis of Article 6(1)(f) of the GDPR (such processing is necessary for the purposes of our legitimate interests which include building networks and improving our services);
- to comply with our legal obligations (including for the purposes of our tax and accounting obligations) - on the basis of Article 6(1)(c) of the GDPR;
- to establish, to investigate or to defend against any claims - on the basis of Article 6(1)(f) of the GDPR (processing is necessary for the purposes resulting from our legitimate interests which oblige us to defend our rights).

The source of your Personal Data:

Where you have not provided us with your Personal Data yourself, it is likely that the source we have used to collect your Personal Data is your employee/contractor who is your contact person.

What data are processed:

If you are our **counterparty (running a sole proprietorship)**, we process, in particular, your Personal Data such as: first and last name, company (name), registered address, NIP (Tax Identification Number), REGON (Business Registration Number), bank account number, e-mail address and phone number.

If you are a **representative / agent of a third party**, we process, in particular, your Personal Data such as: first, middle and last name, PESEL (Polish Resident Number), job position, e-mail address and phone number.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing your Data is voluntary, however, it is a contractual requirement and a pre-condition for the conclusion and performance of a contract. If you fail to provide Personal Data, you will not be able to enter into a contract.

Retention period for Personal Data:

If you are a counterparty or a representative / agent of our counterparty, your Personal Data will be processed for the entire duration of the contract and, after the termination of the contract, for the period required by mandatory legal provisions (including the period specified in the provisions relating to the limitation of claims). Your Personal Data will also be processed for the purposes of maintaining the business relationship until our purpose is completed or until you object to the processing of your Data.

f) WHEN YOU ARE A CONTACT PERSON OF OUR COUNTERPARTY

The purposes of data processing and legal basis for personal data processing:

We process your Personal Data for the following purposes:

- to carry out a relationship under a contract entered into by us as a contracting party (including for the purpose of maintaining communication) with your employer/principal. The basis for the processing is our legitimate interest (Art. 6(1)(f) of the GDPR) consisting in cooperation with your employer/principal that has indicated you as a contact person;
- to initiate contact and to maintain business relationship. The basis for the processing is our legitimate interest (Article 6(1)(f) of the DPA) consisting in building networks and improving our services;
- to establish, to investigate or to defend against any claims. The basis for the processing is our legitimate interest (Article 6(1)(f) RODO) consisting in defending our rights.

The source of your Personal Data:

Where your Data has been provided to us by someone other than you, it is likely that the source we have collected your Data from is your employer/principal who has indicated you as a contact person.

What Personal Data are processed:

We process the Personal Data you provide, such as your name, phone number, email address, and job title.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing your data is voluntary, however, processing of provided Personal Data is a contractual requirement (allowing for performance of a contract entered into by us and your employer/principal). Failure to provide Data may restrict our capability to perform the contract.

Retention period for Personal Data:

Your personal data are processed for the duration of a contract entered into by us and your employer / principal (or for a time you remain a contact person of your employer in relation to the performance of the contract) and, after the termination of the contract, for the period required by mandatory legal provisions (including the period set out in the statute of limitations for claims). Your personal data will also be processed for the purposes of maintaining a business relationship with your employer/contractor until our purpose is completed or until you object.

g) WHAT IF YOU SEND US YOUR RESUME/COVER LETTER

For the recruitment purposes, we process your Personal Data to the necessary extent resulting from the provisions of the labour law or in accordance with the principle of personal data minimisation. **Please do not provide us with more Data than is needed for the recruitment process.**

The purposes of data processing and legal basis for personal data processing:

If your employment is based on an **employment contract**, the processing of Personal Data is carried out on the basis of legal provisions (Article 6(1)(c) of the GDPR), in particular Article 221 § 1 of the Labour Code in the scope of such data as: first, middle and last name, date of birth, contact details, education, professional qualifications and job experience.

If your employment is based on **civil law contract**, we process your Personal Data based on our legitimate interest (Article 6(1)(f) of the GDPR). The legitimate interest is to select the right person for specific contract. If you are chosen, we will process your Personal Data on the basis of Article 6(1)(b) of the GDPR, i.e. the processing is necessary for the performance of a contract to which you are a party or to take action at your request prior to entering into a contract.

Where the information provided in your application contains more information than it is required by law or by our requirements, the processing is based on your consent (Article 6(1)(a) of the GDPR) which you have given us by sending us your resume/cover letter containing this data. If the submitted documents contain information that is not relevant to the recruitment process, it will not be used.

We will also process your Data to verify your qualifications and skills and to determine the terms and conditions of our cooperation on the basis of our legitimate interest (Article 6(1)(f) of the GDPR). The legitimate interest is to select the right person for the job / specific contract.

If you provide your consent to take part in future recruitment procedures, your Personal Data processed on the basis of your consent (Article 6(1)(a) of the GDPR).

In addition, we process your Personal Data in order to establish, to investigate or to defend against any claims. The basis for the processing is our legitimate interest (Article 6(1)(f) of the GDPR) consisting in defending our rights.

Where your Personal Data is processed on the basis of consent, you may withdraw your consent at any time and such withdrawal will not affect the lawfulness of the processing carried out before your withdrawal.

If you have given your consent for future recruitment purposes, your Personal Data will be erased no later than after 1 year - unless you withdraw your consent earlier.

Voluntary provision of Personal Data and what happens if you fail to do so:

In case a candidate for an employee is recruited, providing your Data within the scope specified in Article 22(1) of the Labour Code is required by law, i.e. the Labour Code. Provision of any other Data is voluntary.

In case of recruiting a candidate for third party contractor, failure to provide Data necessary for the recruitment process makes us incapable to consider the given candidate in the recruitment process. Provision of any other Data is voluntary.

Retention period for Personal Data:

Your personal data will be processed for the duration of the recruitment process for the job position indicated in the advertisement and, after that process is completed, for the period required by the mandatory legal provisions (including the period specified by the provisions relating to the limitation of claims). If you have also agreed to participate in future recruitment processes, your Personal Data will be stored for a period of 1 year from the date such recruitment process is concluded. Where Personal Data is processed on the basis of your consent having been given previously, your Personal Data will be processed until your consent is withdrawn. Where processing is based on our legitimate interest, the Data will be processed until our purpose is completed or until an effective objection is provided.

h) WHEN YOU USE OUR PROFILES ON SOCIAL NETWORK WEBSITES (LINKEDIN)

The purposes of data processing and legal basis for personal data processing:

We process your Personal Data that you have disclosed at our profile on LinkedIn (e.g. full name, nickname/pseudonym, comment, reactions/likes). We process personal data for the following purposes:

- to allow you to be active on our profile;
- to run our profile in an engaging way, including any responses to your comments, providing information about our events/products/promotions;
- to collect statistical data and run analytics;
- to ensure defence against any claims.

The basis for the processing of your Personal Data is our legitimate interest (Art. 6(1)(f) of the GDPR). Our legitimate interest is to run our profile on LinkedIn to showcase our business, our products and current job vacancies or to defend our rights.

Voluntary provision of Personal Data and what happens if you fail to do so:

Providing Personal Data is voluntary and is not a statutory / contractual requirement / condition allowing to enter into a contract.

Retention period for Personal Data:

Your Personal Data will be processed in accordance with the provisions indicated in LinkedIn's Privacy Policy.

To find out more about the details concerning processing of Personal Data at this website, including the purposes and scope of the data collected and their further processing, please visit the website showing the privacy policy of the LinkedIn social network:

- LinkedIn: <https://pl.linkedin.com/legal/privacy-policy>

VII. YOUR PERSONAL DATA ARE PROVIDED TO

Your Personal Data may be disclosed to the following: any entities related to us personally, our contractors performing services for us, in particular, in the field of legal, tax and accounting advice, couriers, postal operators, entities providing IT services and support, entities supporting the maintenance of relationships and business initiatives, marketing and recruitment agencies, entities providing photographic or graphic processing services, entities providing archiving services, document destruction or audit services.

VIII. TRANSFER OF DATA TO THIRD COUNTRIES (OUTSIDE THE EEA)

As a matter of principle, we do not transfer your Personal Data to third countries or international organisations. However, because we use third-party providers of communication tools (e.g., email), we may transfer your Data to servers located outside of the European Economic Area (outside of the Member States of the European Union, Iceland, Norway and Liechtenstein). Third party communication tool providers ensure an adequate level of protection of Personal Data through compliance mechanisms in place, such as standard contractual clauses.

IX. DATA RETENTION TIME

The period for which we process Data depends on the type of services provided and the purpose of the processing. As a rule, the Data is processed for the duration of the service until the consent is withdrawn or an effective objection to Data processing is submitted in cases where the legal basis of Data processing is our legitimate interest (primarily marketing purposes).

Once a specific processing period expires, the Personal Data will be permanently erased or anonymized. "Retention period for Personal Data" is separately indicated for each of the processing activities described in Section VI of this Policy.

If you are a person who uses our profiles on social networks, Your Personal Data will be processed in accordance with the provisions indicated in the privacy policies of such social network websites. Links to the privacy policies of social network websites are shown in Section VI(j) of this Policy.

X. YOUR RIGHTS IN RELATION TO DATA PROCESSING

You have the following rights:

- **the right to access** your Data, i.e. the right to obtain information as to whether your Data are being processed, and if so, in particular, any information about the purposes of the processing, the persons we provide with your data, the duration of data storage, etc.;
- **the right to obtain** a copy of the Personal Data being processed;

- **the right to rectify** Data, that is, the right to correct incorrect and/or incomplete Data;
- **the right to erase** Data - we will not be allowed to erase your Data only in specific case where the law obligates us to continue to process it;
- **the right to restrict processing** - under this basis, we cease to carry out activities on your Personal Data, except for any operations to which you have given your consent, and for their storage, in accordance with the adopted retention rules or until the reasons for limiting the processing of the Data cease to exist (e.g. a decision is issued by a supervisory authority allowing further processing);
- **the right to Data portability** which is the right to obtain your Data in a structured, commonly used readable format or the right to request that your Data be transferred directly to other data controllers where technically feasible;
- **the right to object** to the processing of your Data on the basis of a legitimate interest (this applies mainly to the processing of Personal Data for marketing purposes);
- **the right to withdraw consent** to process the Data - e.g. by changing the your browser settings related to cookies. Such withdrawal of consent shall not affect the lawfulness of processing prior to the withdrawal of consent;
- **the right to submit a complaint** to the President of the Office for Personal Data Protection if you believe that your Data is processed unlawfully.

You have the right to object to the processing of your Personal Data if:

- a) the processing of the Personal Data is based on a legitimate interest or a task carried out in the public interest or in the exercise of official authority, and your objection is based on the particular situation in which you find yourself or
- b) your Personal Data is processed for the purpose of direct marketing, including profiling, to the extent that the processing is related to such direct marketing.

If you have a request related to the processing of your Personal Information, please contact us in the way described in Section IV of the Policy.

If we need more details regarding your request, we will ask you to clarify/provide additional information. Providing this information is not mandatory but will be necessary for your request to be processed. Failure to provide the information will result in your request being rejected.

You can make the request in person or by your attorney.

We will respond to your request within one month period. If we need more time to respond, we will notify you before the time limit expires and we will explain why we need more time to process your request.

If you have made a request by electronic means, we will provide you with a response in electronic form unless you have asked us to respond in another form.

XI. PROFILING

We do not make decisions by automated means, including profiling with legal effect.

XII. INFORMATION ABOUT COOKIES

If your Internet browser automatically agrees to the use of cookies and does not block them, we assume, in accordance with Polish legal regulations, that you agree that cookies are stored on your device and accessed, and for information to be stored therein. You may withdraw your consent through appropriate settings of the software, in particular of the Internet browser, installed on your device through which you use our Website.

Cookies are IT data, in particular text files, which are stored on the end user device (e.g. on a computer / tablet / smartphone) of any person visiting our Website, and are intended to support the use the Website if the Internet browser allows it.

The main purpose of cookies is to make your use of the Website easier and to make our Site more user-friendly. The information collected through cookies is stored for purposes including, but not limited to, maintaining your session on the Website, helping us improve the Website by estimating Website usage statistics, and helping us customise the Website to your preferences and actual needs.

The information stored or accessed will not result in configuration changes to your device or the software installed on your end device.

We use four types of cookies on our Site:

- **Session cookies:** these collect information about your activities and only exist for the duration of a given session, which begins when you enter the Website and ends when you leave it. When the browser session ends or the end device is switched off, the stored information is deleted from its memory. Session cookies do not collect personal data or any confidential information stored on your device;
- **Persistent cookies:** these are stored in the memory of your device and remain there until they are deleted or expire. Persistent cookies do not collect personal data or any confidential information stored on your device.
- **Own cookies:** placed by us to ensure correct operation of the Website;
- **Third party cookies:** these are read by IT communication systems of third parties. We use

third party cookies for the following purposes:

to collect general and anonymous statistical data through **Google Analytics** analytical tools (third party cookie administrator: Google Ireland Limited a company registered and operating under the laws of Ireland (registration number: 368047) Gordon House, Barrow Street Dublin 4 Ireland).

Google Analytics automatically collects information about the use of the Website. As a rule, the information is transferred to and stored on Google servers located around the world. In carrying out these activities, we rely on our legitimate interests (Art. 6(1)(f) of the GDPR) involving the production of statistics and their analysis in order to optimise our websites.

We have activated IP anonymisation - your IP address is truncated before being passed on and should therefore not be combined with other Google data. Only on special occasions, full IP address is transmitted to Google servers and truncated there.

We do not collect personally identifiable information as a part of Google Analytics nor do we combine this information to enable such identification. Detailed information about the scope and principles of data collection in connection with this service are shown here: <https://policies.google.com/privacy?hl=pl>.

XIII. POLICY UPDATES

This policy is reviewed and updated on an ongoing basis. The up-to-date version of the Policy has been adopted and is effective as of 19/07/2021.