

# PRIVACY POLICY

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## II. DEFINITIONS

**Administrator/We** – The controller of your personal data is Trend Glass sp. z o. o. with its registered office in Radom, ul. Marii Fołtyn 11, 26-600 Radom, entered in the register of entrepreneurs of the National Court Register maintained by the District Court Lublin-Wschód in Lublin with its seat in Świdnik, VI Commercial Division of the National Court Register under KRS number: 0000164723, NIP: 9482304802, REGON: 672911706, share capital of PLN 7,155,000;

**Policy** – this document, i.e., the Privacy Policy;

**Terms of Service** – terms of service for electronic services provided by Trend Glass sp. z o. o. with its registered office in Radom, published on the website: [www.trendglass.pl](http://www.trendglass.pl);

**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);

**Personal data/Data** – information identifying you or making it possible to identify you directly or indirectly by possessing this information, e.g., name and surname, phone number, email address, job position;

**Website** – the website operated by the Administrator at: [www.trendglass.pl](http://www.trendglass.pl).

### **III. INTRODUCTION**

We ensure that your personal data is processed in accordance with generally applicable laws.

Transparency of our actions is also important to us, which is why we have gathered 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 GDPR, including lawfully, fairly, and transparently. We process data to the minimum extent necessary for specific, explicit, and legally justified purposes. We strive to ensure that your data is always correct, up-to-date, and processed only for the period necessary to achieve the given purpose.

Using appropriate technical and organizational 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 personal data processed by us, and only to the extent necessary for them 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, particularly in accordance with GDPR.

External entities have access to personal data only on appropriate legal grounds.

### **IV. CONTACT WITH DATA CONTROLLER**

If you have any questions or concerns, particularly regarding the processing of your personal data, you can contact us: • by traditional mail, writing to our registered office address: ul. Marii Foltyn 11, 26-600 Radom, • by phone, on business days from 8:00 to 16:00 by calling: +48 508-370-827, • by email, writing to: [iodo@trendglass.pl](mailto:iodo@trendglass.pl).

### **V. CONTACT WITH DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO). You can contact the DPO: • by traditional mail, writing to our registered office address: ul. Marii Foltyn 11, 26-600 Radom, • by phone, on business days from 8:00 to 16:00 by calling: + 48 508 315 180 • by email, writing to: [iodo@trendglass.pl](mailto:iodo@trendglass.pl).

### **VI. PERSONAL DATA PROCESSING**

#### **a) WHEN YOU CONTACT US BY EMAIL OR TRADITIONAL MEANS**

**Purposes and legal basis for processing your personal data:** When you contact us by email or in traditional form (by letter) and this contact is not related to services provided by

us or another concluded contract, the legal basis for processing your personal data is our legitimate interest (Art. 6(1)(f) GDPR). It consists in conducting correspondence with you to handle the given matter. In such cases, we process only personal data relevant to the matter covered by the correspondence. We also process personal data for potential defense against claims based on our legitimate interest (Art. 6(1)(f) GDPR). Our legitimate interest in this case consists in defending our rights.

**Voluntary provision of data and consequences of not providing it:** Providing personal data is voluntary and is not a statutory/contractual requirement/condition for concluding a contract. However, not providing this personal data will prevent us from contacting you and handling the matter.

**Personal data retention period:** Your personal data will be processed for the time necessary to handle the matter, and after this period for the time required by absolutely binding legal provisions (including the period specified by provisions regarding statute of limitations for claims) or until you object, whichever occurs first.

## **b) WHEN YOU CONTACT US BY PHONE**

**Purposes and legal basis for processing your personal data:** When you contact us by phone and this contact is not related to services provided by us or another concluded contract, the legal basis for processing personal data is our legitimate interest (Art. 6(1)(f) GDPR). We will ask for personal data only when it is necessary to handle the given matter. Our legitimate interest consists in conversation to handle the given matter. In such cases, we process only personal data relevant to the matter covered by the contact. We also process personal data for potential defense against claims based on our legitimate interest (Art. 6(1)(f) GDPR). Our legitimate interest in this case consists in defending our rights.

**Voluntary provision of data and consequences of not providing it:** Providing personal data is voluntary and is not a statutory/contractual requirement/condition for concluding a contract. However, not providing this personal data will prevent us from contacting you and handling the matter.

**Personal data retention period:** Your personal data will be processed for the time necessary to handle the matter, and after this period for the time required by absolutely binding legal provisions (including the period specified by provisions regarding statute of limitations for claims) or until you object, whichever occurs first.

## **c) WHEN YOU CONTACT US THROUGH THE "LET'S START COOPERATION" FORM**

Please do not provide us with personal data that is unnecessary for handling the matter.

**Purposes and legal basis for processing your personal data:** When you contact us through the "let's start cooperation" form, we process your personal data contained in the form to handle the inquiry. The legal basis for processing is the necessity of processing for contract performance – providing service according to the Terms of Service (Art. 6(1)(b) GDPR).

We also process personal data for potential defense against claims based on our legitimate interest (Art. 6(1)(f) GDPR). It consists in defending our rights.

**Voluntary provision of data and consequences of not providing it:** Providing personal data is voluntary but necessary for contract performance. Not providing this personal data will prevent us from responding to your questions.

**Personal data retention period:** Your personal data will be processed for the time necessary to handle the matter, and after this period for the time required by absolutely binding legal provisions (including the period specified by provisions regarding statute of limitations for claims).

#### **d) WHEN YOU ARE OUR CONTRACTOR, OR REPRESENTATIVE / PROXY OF A THIRD PARTY THAT IS OUR CONTRACTOR**

**Purposes and legal basis for processing your personal data:** If you are our contractor (conducting sole proprietorship), we process your personal data for the purpose of concluding and performing the contract (including maintaining communication). Processing personal data is necessary for contract performance of which you are a party or to take action at your request before concluding the contract (Art. 6(1)(b) GDPR).

If you are a representative/proxy of a third party, we process your personal data to enable you to perform activities on behalf of the represented entity. Personal data processing is based on our legitimate interest (Art. 6(1)(f) GDPR), which is the necessity of processing data necessary for concluding and implementing contracts with contractors.

If you are our contractor (conducting sole proprietorship) or representative/proxy of a third party, we also process your personal data for the purpose of: • initiating contact and maintaining business relationships – based on Art. 6(1)(f) GDPR (processing is necessary for purposes arising from our legitimate interests, including building a network of contacts and improving our services); • fulfilling our legal obligations (including for tax obligations and accounting) – based on Art. 6(1)(c) GDPR; • establishing, pursuing, or defending against potential claims – based on Art. 6(1)(f) GDPR (processing is necessary for purposes arising from our legitimate interests, consisting in defending our rights).

**Source of obtaining your personal data:** When you have not provided us with your personal data independently, the source from which we obtained your personal data is probably your employee/collaborator who is your contact person.

**What data we process:** If you are our contractor (conducting sole proprietorship), we process, in particular, your personal data such as: name and surname, company (name), registered office address, NIP, REGON, bank account number, email address, and phone number.

If you are a representative/proxy of a third party, we process, in particular, your personal data such as: name(s) and surname, PESEL number, function, email address, and phone number.

**Voluntary provision of data and consequences of not providing it:** Providing your data is a contractual requirement and condition for concluding and performing the contract and is voluntary. The consequence of not providing personal data is the inability to

conclude the contract.

**Personal data retention period:** When you are a contractor or representative/proxy of a third party that is our contractor, your personal data will be processed for the duration of the contract, and after the contract ends - for the period required by absolutely binding legal provisions (including the period specified by provisions regarding statute of limitations for claims). Your personal data will also be processed for maintaining business relationships until we achieve our purpose or until you object to processing your data.

#### **e) WHEN YOU ARE A CONTACT PERSON FOR OUR CONTRACTOR**

**Purposes and legal basis for processing your personal data:** We process your personal data for the purpose of: • implementing cooperation based on a contract concluded by us as a party to the contract (including maintaining communication) with your employer/principal. The basis for processing is our legitimate interest (Art. 6(1)(f) GDPR) consisting in implementing cooperation with your employer/principal who indicated you as a contact person; • initiating contact and maintaining business relationships. The basis for processing is our legitimate interest (Art. 6(1)(f) GDPR), consisting in building a network of contacts and improving our services; • establishing, pursuing, or defending against potential claims. The basis for processing is our legitimate interest (Art. 6(1)(f) GDPR) consisting in defending our rights.

**Source of obtaining your personal data:** In case someone other than you provided us with your data, the source from which we obtained your data is probably your employer/principal who indicated you as a contact person.

**What personal data we process:** We process personal data provided by you such as: name and surname, phone number, email address, job position.

**Voluntary provision of data and consequences of not providing it:** Processing your personal data is a contractual requirement (performance of contract concluded between us and your employer/principal) and is voluntary. Not providing data may make it difficult for us to perform the contract.

**Personal data retention period:** We process your personal data for the duration of the contract concluded by us with your employer/principal (or for the period when you remain a contact person for your employer/principal in connection with contract implementation), and after the contract ends for the period required by absolutely binding legal provisions (including the period specified by provisions regarding statute of limitations for claims). Personal data will also be processed for maintaining business relationships with your employer/principal until we achieve our purpose or until you object.

#### **f) WHEN YOU SEND US YOUR CV/COVER LETTER**

In the recruitment process, we process your personal data to the necessary extent resulting from labor law provisions or according to the principle of personal data minimization. Please do not provide us with data to a broader extent than necessary in the recruitment process.

**Purposes and legal basis for processing your personal data:** In case the basis for

your employment will be an employment contract, personal data processing is based on legal provisions (Art. 6(1)(c) GDPR), particularly Art. 22<sup>1</sup> § 1 of the Labor Code regarding such data as: name(s) and surname, date of birth, contact details, education, professional qualifications, and course of previous employment.

In case the basis for your employment is a civil law contract, we process your personal data based on our legitimate interest (Art. 6(1)(f) GDPR). The legitimate interest consists in selecting the right person for cooperation in the recruitment process.

In case we select you, we will process your personal data based on Art. 6(1)(b) GDPR, i.e., processing is necessary for contract performance of which you are a party, or to take action at your request before concluding the contract.

When the information provided in your application contains broader information than resulting from legal provisions or our requirements, then processing is based on your consent (Art. 6(1)(a) GDPR), which was expressed by you by sending us CV/cover letter containing this data. If the provided documents contain information inadequate to the recruitment process, we will not use them.

We will also process your data for the purpose of verifying your qualifications and skills and determining cooperation conditions based on our legitimate interest (Art. 6(1)(f) GDPR). The legitimate interest consists in selecting the right person for work/cooperation in the recruitment process.

When you consent to participate in future recruitments, your personal data will be processed based on your consent (Art. 6(1)(a) GDPR).

Additionally, we process your personal data for establishing, pursuing, or defending against potential claims. The basis for processing is our legitimate interest (Art. 6(1)(f) GDPR) consisting in defending our rights.

In case your personal data is processed based on consent, you can withdraw it at any time, without affecting the lawfulness of processing performed before its withdrawal.

In case of consent for future recruitment purposes, personal data is deleted no later than after 1 year – unless you withdraw consent earlier.

**Voluntary provision of personal data and consequences of not providing it:** In case of recruiting a candidate for employee, providing data within the scope specified in Art. 22<sup>1</sup> of the Labor Code is required by law, i.e., the Labor Code. Providing other data is voluntary.

In case of recruiting a candidate for collaboration, the consequence of not providing data necessary for conducting the recruitment process is the inability to consider the given candidacy in the recruitment process. Providing other data is voluntary.

**Personal data retention period:** Your personal data will be processed for the duration of recruitment for the position indicated in the announcement, and after this process ends for the period required by absolutely binding legal provisions (including the period specified by provisions regarding statute of limitations for claims). If you also consented to participate in future recruitment processes, your personal data will be stored for 1 year from the day this recruitment process ends. In case of processing personal data based on your previously

expressed consent, your personal data is processed until its withdrawal. In case of processing based on our legitimate interest, data will be processed until achieving the purpose or submitting an effective objection.

### **g) WHEN YOU USE OUR SOCIAL MEDIA PROFILES (LINKEDIN)**

**Purposes and legal basis for processing your personal data:** We process your personal data that has been disclosed by you on our LinkedIn profile (e.g., name and surname, pseudonym, comment content, like reactions). We process personal data for the purposes of: • enabling your activity on our profile, • actively managing our profile, including responding to your comments, providing information about our events/products/promotions, • statistical and analytical purposes, • potential defense against claims.

The basis for processing your personal data is our legitimate interest (Art. 6(1)(f) GDPR). Our legitimate interest consists in managing our LinkedIn profile, which shows our activities, products we offer, current job offers, and defending our rights.

**Voluntary provision of personal data and consequences of not providing it:**

Providing personal data is voluntary and is not a statutory/contractual requirement/condition for concluding a contract.

**Personal data retention period:** Your personal data will be processed in accordance with the provisions specified in LinkedIn's privacy policy.

To obtain details regarding personal data processing on this portal, including purposes and scope of collected data, their further processing, visit the website containing the privacy policy of LinkedIn social media administrator: • LinkedIn:  
<https://pl.linkedin.com/legal/privacy-policy>

## **VII. PERSONAL DATA RECIPIENTS**

Recipients of your personal data may be: entities related to us personally, our subcontractors performing services on our behalf, particularly in the field of legal, tax, and accounting advice, couriers, postal operators, entities providing IT services and support, entities supporting maintenance of business relationships and initiatives, marketing and recruitment agencies, entities providing photographic or graphic processing services, entities providing archival, document destruction, or audit services.

## **VIII. DATA TRANSFER TO THIRD COUNTRIES (OUTSIDE EEA)**

In principle, we do not transfer your personal data to third countries or international organizations. However, in connection with our use of services from external entities providing communication tools (e.g., email), data may be transferred to servers located outside the European Economic Area (outside EU Member States, Iceland, Norway, and Liechtenstein). External entities providing communication tools ensure an appropriate level of personal data protection through applied compliance mechanisms, such as standard contractual clauses.

In connection with using services such as Google, Meta, or other technology providers,

personal data may be transferred to third countries (outside EEA), including the USA. The transfer is based on standard contractual clauses compliant with GDPR and additional technical measures such as encryption and pseudonymization. This is a secure data transfer only to American companies that participate in the Data Privacy Framework program. The list of entities participating in this program is available on the website maintained by the US Department of Commerce. The list includes entities such as Google, Microsoft, and Meta. Details regarding security measures can be obtained by contacting the Data Protection Officer.

## IX. DATA RETENTION PERIOD

The period of data processing by us depends on the type of service provided and the purpose of processing. In principle, data is processed for the duration of service provision, until withdrawal of expressed consent, or submission of an effective objection to data processing in cases where the legal basis for data processing is our legitimate interest (mainly marketing purposes).

After the expiration of appropriate processing periods, personal data will be permanently deleted or anonymized. "Personal data retention period" has been separately indicated for each processing activity described in section VI of the Policy.

When you are a person who uses our social media profiles, your personal data will be processed in accordance with the provisions specified in the privacy policies of these social media platforms. Links to privacy policies of social media platforms can be found in section VI. item j) of the Policy.

## X. YOUR RIGHTS REGARDING DATA PROCESSING

You have the following rights: • **right of access** to your data, i.e., the right to obtain information from us whether your data is being processed, and if so, particularly information about processing purposes, data recipients, data retention period, etc.; • **right to obtain a copy** of personal data subject to processing; • **right to rectification**, i.e., the right to correct incorrect and/or incomplete data; • **right to erasure** of data – we will not be able to delete data only when legal provisions oblige us to continue processing it; • **right to restriction of processing** – on this basis, we cease performing operations on personal data, except for operations to which you have consented, and their storage, according to adopted retention principles, or until the reasons for processing restriction cease (e.g., a supervisory authority decision is issued allowing further data processing); • **right to data portability**, i.e., the right to obtain data in an organized, commonly used, machine-readable format, or the right to request transfer of your data directly to other controllers when technically feasible; • **right to object** to data processing based on legitimate interest (mainly applies to data processing for marketing purposes); • **right to withdraw consent** for data processing – e.g., by changing browser settings regarding cookies. Withdrawal of consent does not affect the lawfulness of processing before consent withdrawal; • **right to lodge a complaint** with the President of the Personal Data Protection Office if you believe your data is being processed unlawfully.

The right to object to processing your personal data applies when: a) personal data



processing is based on legitimate interest or a task performed in the public interest or in the exercise of official authority, and the objection is justified by your particular situation, or b) personal data is processed for direct marketing purposes, including profiling, to the extent that processing is related to such direct marketing.

If you have requests related to processing your personal data, contact us as described in section IV of the Policy.

If we need to clarify your submitted request, we will contact you. The request will be fulfilled within 30 days of its receipt, with the possibility of extension by another 30 days in justified cases. In each case, we will inform you about the reason for extending the deadline. Providing this information is not mandatory but necessary to fulfill the request. Not providing information will result in refusal to fulfill the request.

You can submit the request personally or through an authorized representative.

We will respond to your request within one month of receiving it. When we need more time to respond, we will inform you before the deadline expires and indicate why we need more time to consider your request.

If you contacted us with a request electronically, we will provide you with a response in electronic form, unless you request that the response be provided in another form.

## **XI. PROFILING**

We do not make decisions in an automated manner, including profiling with legal effect.

## **XII. INFORMATION ABOUT COOKIES**

In accordance with applicable law, including the Act of 18 July 2002 on the provision of services by electronic means and Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR), we inform you that our Website uses cookies.

Our Website uses cookies, and we obtain consent for their use only when you click the "Accept" button on the consent banner that appears when you first visit the Website. Until you give consent, cookies will not be used for any purposes other than those necessary for the proper functioning of the Website.

Cookies are small text files that are stored on your device (e.g., computer, tablet, smartphone) and serve to facilitate the use of the Website. These files do not contain personal data and their main purpose is to improve the quality of using our Website by remembering your preferences and collecting anonymous statistical data.

On our Website, we use the following types of cookies: • **session cookies**: collect information about your activities and exist only during the given session, which begins when you enter the Website and ends when you leave the Website. After the browser session ends or the device is turned off, the stored information is deleted from memory. The session cookie mechanism does not allow downloading personal data or any confidential information from your device; • **persistent cookies**: are stored in your device's memory and remain there until they are deleted or expire. The persistent cookie mechanism does not allow downloading personal data or any confidential information from

your device; • **first-party cookies**: placed by us, which ensure proper Website functioning;  
• **third-party cookies**: read by third-party IT systems.

We use third-party cookies for: collecting general and anonymous statistical data through Google Analytics analytical tools (external cookie administrator: Google Ireland Limited, a company registered and operating under Irish law (registration number: 368047) Gordon House, Barrow Street Dublin 4 Ireland).

Google Analytics automatically collects information about Website use. Information is, as a rule, transmitted and stored on Google servers located worldwide. In carrying out these activities, we rely on our legitimate interest (Art. 6(1)(f) GDPR) consisting in creating statistics and analyzing them to optimize our websites.

We have activated IP address anonymization - your IP address is shortened before being transmitted further and therefore should not be linked to other Google data. Only exceptionally is the full IP address transmitted to Google servers and shortened there.

Within Google Analytics, we do not collect data allowing identification, nor do we link this information to enable such identification. Detailed information about the scope and principles of data collection in connection with this service can be found at:

<https://policies.google.com/privacy?hl=en>

You have the right to withdraw consent for using cookies at any time by changing settings in your web browser. Remember that withdrawing consent does not affect the legality of data processing before its withdrawal.

### **XIII. POLICY UPDATES**

The Policy is regularly reviewed. The current version of the Policy was adopted and is effective from February 27, 2025.