

INFORMATION ON PERSONAL DATA PROCESSING

Dear Client,

in accordance with Articles 13 and 14 of 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, hereinafter "**GDPR**"), as the Controller of your personal data, we want you to know:

1. WHO WE ARE:

The Controller of your personal data is the company **Borek Doliński Radcowie Prawni spółka jawna (the general partnership) with headquarters in Poznań**, at Grunwaldzka 224b/9, 60-166 Poznań, entered into the register of entrepreneurs of National Court Register by District Court in Poznan-Nowe Miasto i Wilda in Poznań, 8th Economic Division, under its registration number: 852234, NIP (tax identification number): 7831821915, REGON: 386626683, hereinafter the „**Controller**” or „**us**”.

2. WHY ARE WE PROCESSING YOUR PERSONAL DATA:

Your personal data may be processed by us:

2.1. **for the purpose** of taking steps, at your request, to enter into a contract with you, **on the basis** of Article 6 sec. 1 point b) GDPR (for ordinary data) or Article 9 sec. 2 point a) of GDPR (for special categories of personal data), **until the date** we conclude the contract or the date on which we become aware that a contract between us will not be concluded, but no longer than 3 months from the date on which we exchange the last correspondence aimed at entering into a contract;

– **and in case we enter into contract, also:**

2.2. **for the purpose** of performing the contract concluded with you, **on the basis** of Article 6 sec. 1 point b) (for ordinary data) or Article 9 sec. 2 point a) (for special categories of personal data) of GDPR, **for a period** of our cooperation;

2.3. **for the purpose** of archiving documentation of proceedings covered by our cooperation, **on the basis** of Article 6 sec. 1 point c) (for ordinary data) or Article 9 sec. 2 point j) (for special categories of personal data) of GDPR in connection with Article 5c sec. 1 point 2 of the Act of 06 July 1982 on attorneys at law, **for a period** of 10 years after the completion of the proceedings including processing of your personal data;

2.4. **for the purpose** of complying with the legal obligations imposed on us under the Act of 01 March 2018 on anti-money laundering and countering the financing of terrorism (hereinafter "**AML**"), when the grounds provided for in Article 2 sec. 1 point 14 of AML apply, **on the basis** of Article 6 sec. 1 point c) of GDPR in connection with Article 2 sec. 1 point 14 of AML and the provisions of Chapter 5 of AML (Article 33 et seq.), **for a period** of 5 years from the date of termination of the business relationship between us or from the date of the last occasional transaction (provision of a service to you);

- 2.5. **for the purpose** of complying with other legal obligations imposed on us regarding provision of services to you (in particular accounting and tax obligations), **on the basis** of Article 6 sec. 1 point c) GDPR in connection with Article 86 of the Act of 29 August 1997 - Tax Ordinance, **for a period** of 5 years from the end of the tax year in which our tax obligation arose in relation to the provision of services to you;
- 2.6. **for the purpose** of the possible pursuing of claims or defending against claims that we may have against each other in connection with our cooperation, **on the basis** of Article 6 sec. 1 point f) of GDPR (for ordinary data) or Article 9 sec. 2 point f) of GDPR (for special categories of personal data), thus based on our legitimate interest consisting in the pursuing of possible claims or defense against possible claims that we may have against each other in connection with the cooperation, **until the lapse** of limitation period of these claims.

3. WITH WHOM WE MAY SHARE YOUR PERSONAL DATA:

Your personal data may be shared with the following recipients or categories of recipients:

- 3.1. Hosting (including cloud computing) and email service providers.
- 3.2. Postal service providers.

– and in case we entered into the contract also:

- 3.3. Accounting service providers.
- 3.4. Providers of invoicing and services' time registration systems.
- 3.5. Subcontractors – in particular, substitute attorneys performing certain activities on the basis of a substitute power of attorney.
- 3.6. Entities that are the other party to the legal relationship, in connection with which you have commissioned us to take certain actions, as well as representatives of these persons.
- 3.7. National Revenue Administration.
- 3.8. Common courts and relevant public authorities.

– and in cases provided for in the AML also:

- 3.9. The General Inspector of Financial Information.

4. DO YOU HAVE TO PROVIDE US WITH YOUR PERSONAL DATA:

As a rule, the provision of personal data by you is voluntary, but necessary to achieve the purposes of processing your data - failure to provide personal data will make it impossible to achieve those purposes. In the case of your data processed in order to fulfill our obligations of a public law nature, providing such data is mandatory if you wish to cooperate with us.

Where the processing of your personal data is based on consent (which may relate in particular to the special categories of personal data referred to in Article 9 sec. 1 of GDPR), you have the right to revoke that consent by contacting us in one of the forms indicated in sec. 9 below. However, withdrawal of consent may prevent us from providing services to you and will not affect the validity of the processing of your personal data during the period of validity of consent.

5. WHAT ARE YOUR RIGHTS:

Subject to specific provisions, such as obligations of professional secrecy, under the terms of the General Data Protection Regulation, you have the right to:

- 5.1. request us to access, rectify, erase or restrict the processing of your personal data;
- 5.2. object to the processing of your personal data;
- 5.3. data portability;
- 5.4. lodge a complaint with the supervisory authority - the President of the Personal Data Protection Office (www.uodo.gov.pl, at Stawki 2 in Warsaw).

6. DO WE PROFILE YOUR PERSONAL DATA:

Your personal data will not be subject to solely automated processing resulting in decisions producing legal effects for you or similarly significantly affecting you, including profiling.

7. DO WE TRANSFER YOUR PERSONAL DATA TO THIRD COUNTRIES:

As a rule, your personal data will not be transferred to third countries or international organizations within the meaning of the General Data Protection Regulation.

However, it may be the case, in particular when you contact us via Microsoft Teams or share documentation with us using the OneDrive service, that your basic identification data (in particular your name and e-mail address) and telemetric data (e.g. relating to the quality of your Internet connection) will be processed by entities belonging to the Microsoft capital group. These entities may be located outside the European Economic Area, in particular in the USA, and the legal basis for their processing of personal data and the mechanism securing this process are the so-called standard contractual clauses adopted by the European Commission. Microsoft is a leading and one of the most reputable providers of IT services, guaranteeing the highest standards of security of the processed information. You can find out more about the principles of personal data processing by Microsoft here: <https://www.microsoft.com/en-us/trust-center/privacy/gdpr-overview>.

8. DO WE PROCESS YOUR PERSONAL DATA OTHER THAN DATA YOU HAVE PROVIDED TO US:

If you are an entrepreneur, in some cases we can verify your data in publicly available registers - such as CEIDG (the Central Register and Information on Economic Activity), KRS (the National Court Register), CRBR (the Central Register of Real Beneficiaries), list of VAT taxpayers. If we obtain your data from the publicly available registers mentioned above, they include the categories of personal data published in the aforementioned registers. We may process such data in order to identify you and, for example, to obtain your data necessary to draw up a contract between us or to issue an invoice, and in order to fulfil the obligations imposed on us by the AML.

9. HOW CAN YOU CONTACT US:

Any correspondence in matters related to the processing of your personal data should be sent to our address indicated in pt. 1 above or to the mailbox office@bdrp.pl with annotation "Personal data".