

## INFORMATION OBLIGATION CLAUSE FOR CUSTOMERS AND CONTRACTORS

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As a responsible organization that is aware that information has a particular value and is a resource that requires proper protection, we are committed to duly informing you about matters related to the processing of personal data, primarily because of the content of data protection legislation, including Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals concerning the processing of personal data and on the free flow of such data and repealing Directive 95/46/EC ("GDPR"). Therefore, this document provides key information about the legal basis for processing personal data, how it is collected and used, and the rights of data subjects.

### **I. Who is the data administrator**

Please be informed that the Administrator of your data is **Zakłady Mechaniczne "BUMAR - ŁABĘDY" S.A.** with its registered office in Gliwice, 9 Mechaników Street, 44-109 Gliwice, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, X Economic Division of the National Court Register, under the KRS number 0000016872, having the NIP number 6310102011, and REGON number 271829754, hereinafter referred to as **the "Administrator"**.

The Administrator has appointed a Data Protection Officer, whom you can contact at e-mail: [iod@bumar.gliwice.pl](mailto:iod@bumar.gliwice.pl).

### **II. General information**

We attach particular importance to protecting the privacy of our clients and customers. One of its key aspects is the protection of the rights and freedoms of individuals in connection with processing their personal data.

We ensure that the processing of your data is carried out in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons concerning the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (hereinafter: "GDPR"), the Act of May 10, 2018 on the protection of personal data, as well as specific provisions (contained, among others, in the Accounting Act).

**Zakłady Mechaniczne "BUMAR - ŁABĘDY" S.A.** is the Administrator of personal data within the meaning of Art. 4 pt. 7 GDPR. We also use the services of processing entities referred to in Art. 4 pt. 8 GDPR - they process personal data on behalf of the Administrator (these are, e.g., law firms and software providers).

We implement appropriate technical and organizational measures to ensure a degree of security corresponding to the possible risk of violating the rights or freedoms of individuals with different probability of occurrence and severity of the threat. We base our data protection measures on adopted policies and procedures and regular training to improve our employees' and associates' knowledge and competence.

### **III. Purposes of personal data processing and legal basis**

We use the personal data of our clients and customers to perform the contract and provide our services (Article 6(1)(b) of the DPA). In some situations, processing is necessary to fulfill a legal obligation incumbent on us as an Administrator. Such obligations arise, for example, under the Civil Code or the Accounting Act (Article 6(1)(c) GDPR). Processing may also be necessary for purposes arising from our legitimate interests, an example of which is the assertion of claims from our business activities.

### **IV. On what basis do we process personal data**

We exercise diligence to protect the interests of data subjects and, in particular, ensure that the data is:

- a. processed lawfully, fairly, and transparently to the data subject,
- b. collected for specific, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes,
- c. adequate, relevant, and limited to what is necessary for the purposes for which they are processed,
- d. correct and updated as necessary. We take steps to ensure that personal data that is inaccurate in light of the purposes of its processing is promptly deleted or corrected,
- e. kept in a form that allows the identification of the data subject for no longer than necessary to achieve the purposes of the processing,
- f. processed in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss or destruction.

### **V. What rights do you have**

We shall take appropriate measures to provide all relevant information in a concise, transparent, understandable, and easily accessible form and conduct all communications with you regarding the processing of your data in connection with the exercise of your right to:

- a. information provided when obtaining personal data,
- b. information provided upon request - about whether data is being processed, and other matters specified in Article 15 of the GDPR, including the right to a copy of the data,
- c. data rectification,
- d. being forgotten,
- e. processing restrictions,
- f. data portability,
- g. Objections,
- h. Not to be subject to a decision based solely on automated processing (including profiling),
- i. information about data protection violations.

If your data is processed based on consent, you can withdraw it. Consent may be withdrawn at any time, which does not affect the lawfulness of the processing carried out before the withdrawal.

The security of your data is our top priority; however, if you suspect that we are violating the provisions of the GDPR by processing your data, you have the right to file a complaint with the President of the Office for Personal Data Protection.

## **VI. How we will contact you**

We provide information in writing or by other means, including electronically, where appropriate. If you request it, we may provide the information orally as long as we confirm your identity by other means. If the request is made electronically, to the greatest extent possible, the information will also be provided electronically unless another preferred form of communication is indicated to us.

## **VII. Within what timeframe we will fulfill the request**

As a rule, we strive to provide information promptly within a month of receiving a request. If necessary, this deadline may be extended by another two months due to the complexity of the request. However, in any case, we will inform you within one month of receipt of the request about the action taken and (if applicable) the deadline extension, stating the reason for such delay.

## **VIII. Information about recipients of personal data or categories of recipients**

We may transfer your data to companies or other trustworthy business partners that provide services on our behalf. If we cooperate with entities that process personal data on our behalf, we only use such processors that provide sufficient guarantees to implement appropriate technical and organizational measures so that data processing meets the requirements of the GDPR and protects the rights of data subjects. We check in detail the entities to which we entrust the processing of your data. We enter into detailed agreements with them and periodically inspect the compliance of processing operations with the content of such contracts and the law.

Your data may receive:

- a) entities and authorities authorized to process personal data under the law,
- b) Banks, when settlements are required,
- c) courier companies,
- d) entities providing software delivery,
- e) cloud service providers,
- f) ISPs,
- g) Law firms providing consulting services,
- h) Polska Grupa Zbrojeniowa SA and companies within the Polska Grupa Zbrojeniowa Capital Group.

## **IX. How do we take care of personal data processing**

To meet the requirements of the law, we have developed detailed procedures covering such issues as:

- a. Data protection in the design phase and default data protection,
- b. data protection impact assessment,
- c. notification of violations,
- d. Keeping a register of data processing activities,
- e. data retention,
- f. Implementation of data subjects' rights.

We regularly review and update our documentation to demonstrate compliance with the law requirements following the principle of accountability formulated in the GDPR. Still, out of concern for the interests of data subjects, we strive to incorporate best market practices.

#### **X. The period for which we will store your data**

We store personal data in a form that allows identification of the data subject no longer than is necessary for the purposes for which the data are processed. After such a period, we either anonymize the data (deprive it of characteristics that make it possible to identify the person) or delete it. In the retention procedure, we ensure that the storage period of personal data is limited to a strict minimum.

We determine the period of data processing primarily based on legal regulations (e.g., the duration of retention of accounting documents), as well as the legitimate interest of the Administrator (e.g., marketing activities). The retention policy covers both data processed in paper and electronic form.

The storage period of personal data depends primarily on the purpose for which the data is collected, according to the following criteria:

- a. the period of execution of the cooperation agreement/order - in the case of data processing for the purpose of entering into and executing a cooperation agreement,
- b. The period necessary to process the submitted complaint - in the case of data processing to handle the process of filled complaints,
- c. until the settlement of the dispute/settlement of the parties, taking into account the relevant statute of limitations for claims - in the case of data processing to claim and take actions of a debt recovery nature,
- d. until you object - in the case of data processing for satisfaction surveys among the Administrator's contractors and sending commercial information).

#### **XI. Authorization**

We shall ensure that any person acting under our authority and accessing your data shall process it only on our instructions unless otherwise required by Union or Member State law.

#### **XII. Changes to the document**

This document may be supplemented or updated according to the current needs of the Administrator to provide current and reliable information. The Administrator will inform of any changes by publishing a new document version via **[www.bumar.gliwice.pl](http://www.bumar.gliwice.pl)**.

#### **XIII. Automated data processing**

Your data will not be processed by automated means (including profiling) so that any decisions could be made due to such automated processing.