

PRIVACY POLICY OF DZP COMPLIANCE P.S.A (“PRIVACY POLICY”)

1. SCOPE OF APPLICATION:

This Privacy Policy sets out the rules for the processing of your personal data processed by DZP COMPLIANCE P.S.A related to:

- 1.1 providing contractors with a platform for handling reports from whistleblowers ("Whistleblowing Platform");
- 1.2 running the website <https://zglaszam.to> ("Website");
- 1.3 conducting communication by e-mail or using the contact form available on the Website ("Contact Form");
- 1.4 conducting marketing activities.

2. PERSONAL DATA CONTROLLER

The controller of your personal data provided in the above contact form is **DZP COMPLIANCE P.S.A with its registered office in Warsaw (00-124) at Rondo Organizacja Narodów Zjednoczonych 1/floor 21**, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, National Court Register: 0000931999, NIP: 5252885503, REGON: 520496501, share capital: PLN 50,000 ("Controller", "We").

Contact with the Controller is possible by e-mail: dzp.whistleblowing@dzp.pl or by post to the abovementioned address.

3. BASIC INFORMATION ABOUT PERSONAL DATA PROCESSING: TYPE, PURPOSE, LEGAL BASIS, STORAGE PERIOD

The type, legal basis, storage period, and the need to provide your personal data depends on the purpose for which they are processed.

Purpose	Type of personal data	Legal basis	Storage period	Who does it apply to?	The need to provide personal data
Providing the Whistleblowing Platform to a given employer	Data on: - whistleblower, - persons to whom the reports relate, - other persons mentioned in the report,	Legal obligation resulting from the provisions of the Act on the protection of persons reporting breaches of the law (pursuant to Article 6(c) of the GDPR) or the legitimate interest of the controller, which is the	The data is processed until it is deleted by representatives of the employer using the system - no longer than for the period specified in national laws implementing the provisions of the	Users of the Whistleblowing Platform, which may be: - whistleblowers (in terms of sending reports), - representatives of the employer using the system	Providing data is, as a rule, voluntary, however, the employer using the system may require the whistleblower to provide personal data if he does not accept anonymous reports

	<ul style="list-style-type: none"> - representatives of the employer using the system; including: - first name and last name, - position, function, place of employment, - phone number, - e-mail address, - other data that may be provided by the whistleblower in the report, - other data that may be entered by representatives of the employer using the system in the course of internal proceedings. 	<p>receipt, verification and clarification of notifications of violations of law (pursuant to Article 6(1)(f) of the GDPR)</p>	<p>Whistleblowing Directive¹. In Poland, this period is 15 months from the end of the calendar year in which the proceedings initiated by the whistleblower's report were completed (regardless of whether they are internal explanatory proceedings of the employer using the system or possible external proceedings, e.g. court proceedings or conducted by inspection or supervisory authorities).</p>	<p>(in the scope of managing reports)</p>	
Running the Website	Data collected via necessary, statistical and marketing cookies (more in the Cookie Policy below)	<p>The legitimate interest of the Controller consisting in ensuring the proper operation of the Website (Article 6(1)(f) of the GDPR)</p> <ul style="list-style-type: none"> - applies to necessary cookies <p>Consent (Article 6(1)(a) of the GDPR) - applies to statistical and marketing cookies</p>	It depends on the type of cookies (more information in the Cookies Policy below)	Users of the Website	Installing cookies on your electronic device ("Device") through which you access the Website (e.g. telephone, computer) is necessary to use our Website. Failure to install essential cookies will prevent you from using our Website. Installing statistical or marketing cookies on your Device is

¹ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law

					voluntary. However, if they are not installed, the functionalities of the Website will be significantly limited.
Conducting communication by e-mail	Personal data provided in the e-mail	The legitimate interest of the Controller consisting in communicating with people who expect a response from the Controller (Article 6(1)(f) of the GDPR)	Until an effective objection is filed, but no longer than for the period of limitation of claims that may arise in connection with the subject of the communication	People contacting the Controller by e-mail	Providing data is voluntary, failure to provide them prevents contact with the Controller
Conducting communication using the Contact Form	Personal data provided in the Contact Form	The legitimate interest of the Controller consisting in communicating with people who expect a response from the Controller (Article 6(1)(f) of the GDPR)	Until an effective objection is filed, but no longer than for the period of limitation of claims that may arise in connection with the subject of the communication	People contacting the Controller via the Contact Form	Providing data is voluntary, failure to provide them prevents contact with the Controller
Conducting marketing activities	Contractor data obtained during the performance of the contract	The legitimate interest of the administrator consisting in promoting the subject of his activity (Article 6(1)(f) of the GDPR)	Until an effective objection is filed	Controller's contractors	Providing data is voluntary, failure to provide them will prevent directing advertising content to you

4. RECIPIENTS OF PERSONAL DATA

Your personal data is provided only to entities providing the Controller with services related to the functioning of the Whistleblowing Platform (IT companies), the Website (IT companies), conducting communication and undertaking marketing activities

5. RIGHTS RELATED TO PERSONAL DATA

The provisions of the GDPR² provide you with the following rights related to the processing of your personal data:

- 5.1 **The right of access to personal data (Article 15 of the GDPR)** - you have the right to obtain confirmation from us whether we process your personal data, and if this is the case, you can also access them, including a copy thereof and obtain specific information regarding their processing (this information is generally included in the Privacy Policy).
- 5.2 **The right to rectify personal data (Article 16 of the GDPR)** - you have the right to request us to immediately rectify personal data that is incorrect. In addition, you have the right to request completion of incomplete personal data, if required by the purpose of their processing.
- 5.3 **The right to delete personal data "right to be forgotten" (Article 17 of the GDPR)** - you have the right to request that your personal data be deleted immediately, and we are obliged to delete them without undue delay if one of the following circumstances occurs:
 - 5.3.1 the processing of your personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - 5.3.2 you have withdrawn the consent on which the processing of your personal data is based and there is no other legal basis for the processing;
 - 5.3.3 you have objected to the processing of your personal data and there are no overriding legitimate grounds for processing;
 - 5.3.4 you have objected to the processing of your personal data for direct marketing purposes;
 - 5.3.5 your personal data has been unlawfully processed;
 - 5.3.6 your personal data must be deleted in order to comply with a legal obligation under EU law or Polish law.

We may refuse to exercise your right to delete personal data if one of the conditions provided for in art. 17 sec. 3 GDPR (e.g. establishing, pursuing or defending claims).

- 5.4 **The right to limit the processing of personal data (Article 18 of the GDPR)** - you have the right to request the restriction of the processing of your personal data in the following circumstances:
 - 5.4.1 contest the accuracy of your personal data - for a period enabling us to verify their accuracy;
 - 5.4.2 the processing of your personal data is unlawful and you oppose their erasure and request the restriction of their use instead;
 - 5.4.3 we no longer need your personal data to achieve the purposes of processing, but you need them to establish, pursue or defend claims;
 - 5.4.4 you have objected to the processing of your personal data - until it is determined whether the legitimate grounds on our part override the grounds for your objection.

² 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)

- 5.5 **The right to transfer data (Article 20 of the GDPR)** - if we process your personal data on the basis of consent or in connection with the performance of the contract and the processing is carried out in an automated manner, you have the right to receive your personal data from us in a structured, commonly used, machine-readable format and the right to request that this personal data be sent to another controller.
- 5.6 **Right to object (Article 21 of the GDPR)** - you have the right to object to the processing of your personal data by us, if we process it on the basis of the legitimate interest of the administrator. However, we will be able not to exercise your right to object if we demonstrate the existence of valid legitimate grounds for processing, overriding your interests, rights and freedoms, or grounds for establishing, pursuing or defending claims. In addition, if we process your personal data for direct marketing purposes, you have the right to object to such processing at any time.
- 5.7 **Right to withdraw consent (Article 7(3) of the GDPR)** - you have the right to withdraw your consent at any time, on the basis of which we process your personal data. Withdrawal of consent does not affect the lawfulness of the processing that was made on the basis of consent before its withdrawal.

To the extent that the data is placed on the Whistleblowing Platform, the above rights apply only when further processing is not necessary for the company to comply with a legal obligation and there are no other overriding legal grounds for processing.

In order to exercise the above rights or obtain additional information on the processing of your personal data, please contact us at the data indicated in point 2 Privacy Policy.

At the same time, we would like to inform you that you have the **right to lodge a complaint** to the supervisory body dealing with the protection of personal data, i.e. the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw (<https://uodo.gov.pl/pl/p/kontakt>).

6. **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES (I.E. OUTSIDE THE EUROPEAN ECONOMIC AREA)**

Personal data will not be transferred outside the European Economic Area.

7. **OTHER INFORMATION**

Based on the personal data provided by you, we do not make decisions in an automated manner (without the human factor), and we do not use them for profiling purposes.

DZP COMPLIANCE P.S.A COOKIES POLICY (“COOKIES POLICY”)

1. GENERAL INFORMATION

1. This cookies policy ("Cookies") for <https://www.zglaszam.to> ("Website") is for Website users and explains what cookies are, why we use them, how they work and the user's rights and obligations.
2. The cookies' administrator is DZP Compliance PSA., Rondo ONZ 1, 00-124 Warsaw, Poland ("Service Provider").

2. INFORMATION COMPILED

1. When using the Website data about the user is automatically compiled, i.e. IP address, domain name, browser type and type of operating system. These data can be compiled by cookies, the Google Analytics system and the Web Beacon system and can be saved on server logs.
2. The cookies referred to in point 1 are sent to a user's computer or other device when the user browses the Website. Cookies remember the user's preferences, which enhances the quality of services, improves search results and the applicability of the information displayed and tracks user preferences. Users can opt out of cookies by selected the appropriate setting on the browser used.
3. Consent is given to the Service Provider storing or accessing cookies on your device through settings on the browser installed on the user's device. If you want to remove cookies from your device you can do so by using your browser options. If you want to remove a particular cookie you can find it through browser options by using the password „zglaszam”.
4. The Service Provider uses the cookies listed below (unless otherwise stated):
 - A. Strictly necessary cookies – cookies of key importance that enable users to move around the Website and use its features, such as access to safe sections of the Website. Without these cookies the Website may not be displayed properly. These are registered user cookies – unique identifiers given to each user to enable them to be recognised when they visit or return to the Website;
 - B. II. Performance cookies – collect information about how visitors use the Website, i.e. which pages they visit most often and if they get error messages. Data compiled by these cookies are anonymous and are only used to improve how the Website works;
 - C. III. Functionality cookies – register choices made by users (such as user name, language or the region the user is in). These cookies can also be used to remember the changes a user makes, e.g. to text size, fonts and to other parts of the Website that can be customised. Data compiled by cookies may be used by the Service Provider to track the behaviour of users and to make content available).
5. Google Analytics referred to in point 1 is an internet analytical system that generates statistics about the Website's traffic used to carry on marketing activities.
6. Web Beacon referred to in point 1 is used to monitor user activity on a website or to check the email address of recipients of content sent by a user through a website when messages containing the Web Beacon file are open.

7. Third party social media can register information about you, e.g. when you click on "add" or "like" in relation to a social network when visiting our site. We have no control over these third parties or their actions. Information about social networking sites can be found on the sites. We recommend that you read the terms and conditions of use and privacy policy of these sites before using them.

3. DATA USAGE

Data given by a user or compiled automatically are used by the Service Provider to:

- A. ensure proper functioning, configuration, security and reliability of the Website,
- B. monitor session status,
- C. adjust information displayed to the user's preferences, or
- D. analyse, compile statistics, review and audit Website displays..

4. CONTACT

If you have any questions or would like more information about this Cookies Policy, please email us at: dzp.whistleblowing@dzp.pl

5. MISCELLANEOUS

The rules set out in the Cookies Policy are governed by Polish law.