

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

As a result of the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), we would like to inform you of our personal data processing policy, which is as follows:

### **Personal Data Administrator (GDPR)**

Profitroom Ltd., 6th Floor, 2 London Wall Place, London, EC2Y 5AU (company# 13470993) is a company registered with Companies House, United Kingdom. The incorporation date is June 22, 2021 ("Administrator").

Contact us by e-mail at [contact@profitroom.com](mailto:contact@profitroom.com). More information can be found on our website [www.profitroom.com](http://www.profitroom.com)

### **Data Protection Officer (DPO)**

Krzysztof Dziemian, e-mail [gpdr@profitroom.com](mailto:gpdr@profitroom.com).

### **Security of personal data**

In accordance with the GDPR, your personal data will be processed, in written or electronic form, for the purposes set out below and using appropriate methods to ensure the security and confidentiality of your personal data as required by Article 32 of the GDPR. Our cooperation with business entities is governed by the relevant legislation. Your personal data will not be processed outside the EEA.

### **We process your personal data for the following purposes:**

#### **1. Recruitment**

**Legal basis:** Your personal data, to the extent specified by the relevant employment legislation, will be processed for the purposes of the initial recruitment procedure (Article 6(1)(b) of the GDPR), and other data will be processed on the basis of your consent (Article 6(1)(a) of the GDPR), which can be withdrawn at any time. If any documents contain sensitive data, as mentioned in Article 9(1) GDPR, such data will be processed subject to your consent under Article 9(2)(a) of the GDPR.

**Data retention period:** your personal data will be processed for the duration of the recruitment procedure subject to your additional consent. Your personal data will also be processed for future recruitment procedures for a maximum of 24 months, or until you withdraw your consent.

#### **2. Employment**

**Legal basis:** Your personal data will be processed for employment-related purposes, to maintain employee files, to record working time, to meet archiving requirements including notifications to the Social Insurance Institution (ZUS), and for tax purposes, as well as for salary purposes, to calculate deductions, including for tax and social insurance purposes, to store employee files, and as evidence in proceedings before courts or other competent state authorities, including for the purpose of establishing, defending and pursuing claims. Legal basis: the Labour Code and other laws and acts implementing it, defining the rights and

obligations of employees and employers, Article 6(1)(b),(c),(d) and (f) of Regulation (EU) 2016/679 of the European Parliament and of the Council. In specific cases (debt collection, on-site activity monitoring), the legal basis for the processing is the legitimate interest of the Personal Data Controller (Article 6(1)(f) of the GDPR).

**Period for which your personal data will be stored:** your personal data will be stored by Profitroom S.A. ul. Franklina Roosevelta 9, 60-829 Poznan, Poland for as long as it is necessary for the purposes specified above and then for as long as the applicable law allows. Personnel and health and safety data for 50 or 10 years (depending on when the person was employed) starting from the year in which the employment ended.

### **3. Sale of services provided by the Administrator of Personal Data (APD)**

**Legal basis:** Your personal data will be processed for the performance of the contract on the basis of Article 6(1)(b) of the GDPR, as well as for the fulfilment of the legal obligation set out in Article 6(1)(c) of the GDPR, including, in particular, the provisions of the Accounting Act and the Civil Code.

**Period for which your personal data will be kept:** your data will be kept for a period of 5 years from the first day of the year following the year in which the relevant accounting document is issued or, alternatively, for the duration of the contract and after the expiry of the limitation period for claims under the applicable law.

### **4. Provision of support services**

**Data source:** Your personal data must be processed in order to enter into any contract relating to APD products. Therefore, if you refuse to provide any personal data that is expressly mandatory, we will not be able to provide you with the requested service.

**Legal basis:** Article 6(1)(b) of the GDPR.

**Period of retention of personal data:** in accordance with the contract.

Recipients of data: Entities described in legal regulations or other entities processing data on the basis of relevant agreements with the APD.

### **5. Business-related marketing activities**

**Legal basis:** Article 6(1)(a) of the GDPR and Article 6(1)(f) of the GDPR, marketing of services. **Period of retention of your personal data:** Marketing data – until the data subject requests erasure of the personal data.

### **6. Future claims**

**Legal basis:** Article 6(1)(f) of the GDPR regulation.

**Period for which your personal data will be kept:** In order to handle potential claims, your personal data will be kept until the expiry of any period of limitation under applicable law.

### **7. Security of persons and property**

**Data source:** Data from surveillance cameras.

**Legal basis:** Article 6(1)(f) of the GDPR.

**Period for which personal data will be stored:** Up to three months after the recording of the material.

### **8. Security of persons and property**

**Data source:** GPS fleet monitoring data

**Legal basis:** Article 6(1)(f) of the GDPR.

**Period for which personal data will be stored:** NOT APPLICABLE

### **9. Customer satisfaction survey**

**Data source:** data from recorded telephone conversations with customers.

**Legal basis:** Article 6(1)(a) of the GDPR.

**Period of retention of personal data:** Until the individual withdraws consent. If your personal data is needed for purposes other than those described above, you will be informed of this directly in the relevant form, or during the first activity with your participation.

### **10. Sending of commercial information**

**Data source:** data taken from the form completed by the individual.

**Legal basis:** Article 6(1)(a) of the GDPR.

**Personal data storage period:** From the moment of granting the consent until the moment of its withdrawal, with the reservation that the data may be processed despite the withdrawal of the consent only to the extent and for the purpose if the processing is necessary to establish, assert or defend the claims of the Administrator in relation to the consent granted.

### **11. Display of advertising on social media**

**Data source:** data taken from the form completed by the individual.

**Legal basis:** Article 6(1)(a) of the GDPR.

**Personal data storage period:** From the moment of granting the consent until the moment of its withdrawal, with the reservation that the data may be processed despite the withdrawal of the consent only to the extent and for the purpose if the processing is necessary to establish, assert or defend the Administrator's claims in relation to the consent granted.

### **Your rights in relation to the processing of your personal data**

- If the legal basis is Article 6(1)(a) or (b) of the GDPR:
  - the right to access your data
  - the right of rectification
  - the right to the erasure of data (the right to be forgotten)
  - the right to restrict processing of personal data
  - the right to data portability
- If the legal basis is Article 6(1)(c) of the GDPR:
  - the right of access to your data
  - the right of rectification
  - the right to restrict the processing of your personal data
- If the legal basis is Article 6(1)(e) or (f) of the GDPR:
  - the right to access your data
  - the right of rectification
  - the right to the erasure of data (the right to be forgotten)
  - the right to restrict processing of personal data
  - the right to object to the processing of personal data

### **Right of withdrawal of consent**

If your data is processed on the basis of your consent (Article 6(1)(a) of the GDPR), we will process your data until you withdraw your consent. You may withdraw your consent at any

time by sending an e-mail to [gpd@profitroom.com](mailto:gpd@profitroom.com), or in person at the office of the Data Controller. The withdrawal of consent shall not affect the lawfulness of data processing based on consent before its withdrawal.

### **Right to lodge a complaint with a supervisory authority**

In the event of a breach of security of data processing by APD, you may lodge a complaint with the supervisory authority in charge of personal data protection - the President of the Office for Personal Data Protection (OPDP). The current address of the supervisory authority is: the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw.

### **Recipients of the data**

For processing purposes, access to your personal data may be granted to other recipients and categories of recipients, such as:

- the competent public administration and local government authorities, to the extent and for the purposes permitted by applicable law.
- service providers, including, in particular, providers of personal data protection, auditing, IT support, software, training, financial services, insurance, service and maintenance and mailing services.
- other entities that process personal data for the Data Controller on the basis of relevant contracts.

The Data Controller may use automated decision-making, including profiling, for marketing and customer service purposes.