

## **PRIVACY AND COOKIES POLICY**

Revision date: 2023-03-07

This Privacy and Cookies Policy (the “policy”) is for this website: <https://www.walstead-ce.com/> (the “Site”) and served by Walstead Kraków Sp. z o.o., whose registered office address is: ul. Obrońców Modlina 11, 30-733 Krakow, Poland, whose company’s registration KRS No. and tax identification number (NIP) are: 0000046086 and 676-01-01-661, registered by Circuit Court for Kraków-Śródmieście in Kraków, Division XIth, Business Court of National Court Register, whose initial share capital is: PLN 100.807.658,00, waste registry number (BDO): 000028356 (in this policy and throughout this Site referred to as the “Walstead Kraków” or “we”).

This policy governs the processing of personal data of the users who choose to use this Site and the usage of cookies from this Site.

It explains how we comply with the General Data Protection Regulation (the “GDPR”) and the Polish Telecommunication Law to the extent it has been amended to transpose the ePrivacy (2002/58/EC) Directive into the Polish law (the “PTL”). Walstead’s compliance with the GDPR is ensured also through other company policies and procedures. Such other policies and procedures regulate the matters not described in this policy.

Walstead Kraków is a data controller of your personal data, unless otherwise indicated in this policy.

### **INFORMATION WE COLLECT & SHARE**

Walstead Kraków may process basic personal data which you voluntarily provide through forms on this Site, through electronic mail you send to us, or through other means of communication between you and us (e.g. by receiving marketing information). This may include: identification data (such as name, address (private/work), phone number (private/work), e-mail address (private/work), country of residence; employment details (for example, the organisation you work for, your job title and your education details); details of how you use our products and services; details of how you like to interact with us and other similar information.

Walstead Kraków may also process information pertaining to users of this Site, including IP addresses, cookie identifiers, logged data, your browser type and language, source domain names, specific web pages, length of time spent, and pages accessed. Some of such information may constitute your personal data.

Walstead Kraków also processes information about individual contacts for Walstead’s customers (the “Business Contact Information”) in the ordinary course of its business for managing and maintaining customer relationships. In particular, we may obtain the following types of Business Contact Information: name, address, invoice information including bank account information, and order information.

We may collect or obtain personal data from you in the performance of our business, when you give it to us (i.e. you submit a form on this Site), when other people give it to us (i.e. your employer, third party service providers, your suppliers) or because it is publicly available.

The types of personal data that we process will vary depending on the nature of the relationship between us, the services that we provide or how you use this Site.

Unless otherwise specified or prohibited, Walstead Kraków may share information with other companies from Group of companies to which we belong, our affiliates and subsidiaries, business partners, service providers, or contractors who are required to provide you with services which you have requested from us or who provide us with services either related to this Site or otherwise.

Walstead Kraków may also post links to third party websites. These third party websites are operated by companies that are outside of our control, and your activities at those third party websites will be governed by the policies and practices of those third parties. We encourage you to review the privacy policies of these third parties before disclosing any information, as we are not responsible for the privacy policies of those websites. We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## HOW WE USE INFORMATION

Walstead Kraków uses your personal data or other information obtained by setting cookies to provide you with services which you request and to improve our existing services and the content of this Site.

When you contact Walstead Kraków through this Site (via social media, the contact form or by phone), we may keep a record of your communication to help solve any issues that you might be facing and respond to your questions and comments submitted through this Site.

As we are a business to business enterprise we have no direct commercial relationship with consumers or end users. We have commercial relationships with companies that serve consumers and as a result consumer personal data may be shared with us in the performance of our service, for instance where we operate a mailing service for a product. When we do so we act as data processor and process such personal data on behalf of the subject companies.

Walstead Kraków may also use or disclose your personal data or information obtained by setting cookies when Walstead Kraków believes, in good faith, that such use or disclosure is reasonably necessary to (i) comply with law, (ii) enforce or apply the terms of any of our user agreements, or (iii) protect the rights, property or safety of Walstead Kraków's users, or others.

Walstead Kraków reserves the right to transfer and disclose your personal data and information obtained by setting cookies if Walstead Kraków becomes involved in a business divestiture, change of control, sale, merger, or acquisition of all or a part of its business.

We will retain your personal data for a reasonable period, i.e. the longest of the following periods: (i) as long as is necessary for the relevant activity or services; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the services.

Depending on the country in which you live, work or access this Site, your personal data or information obtained by setting cookies may be retained for a reasonable time for use in future contact with you, or for future improvements to Walstead Kraków' services.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you.

## COOKIES

### **What are cookies?**

Cookies are small files saved on the user's computer's hard drive or other user's device that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website.

### **Why we use cookies?**

In principle, this Site makes use of cookies for the purposes of:

- To enable the operation of the basic functions of the website;
- To contribute to the usability of the website by enabling basic functions such as page navigation and access to secure areas of the website;
- This Site and system administration and improvement;
- proper functioning of the website, in particular for the purpose of remembering login sessions or filling out forms.

To enable Walstead Kraków to access the effectiveness and usefulness of this Site, and to give you the best user experience, we collect and store information which might be consider as personal data.

### **What types of cookies we use?**

We use **necessary cookies** which ensure that our Site and its basic functions function properly. Without them, you will not be able to use our online services properly. These cookies are exempt from the obligation to obtain your consent (Article 173(3) of the Telecommunications Act).

### **Privacy notice required for processing personal data in connection with using cookies**

When we use cookies we process your personal data. Such personal data includes cookie identifiers.

Such persona data will be processed by Walstead Kraków, as data controller. Our address and other contact details are available at our web site: <https://www.walstead-ce.com/en/contact-us/>. Our data protection dedicated e-mail address is: [dpo@walstead-ce.com](mailto:dpo@walstead-ce.com).

We will process such personal data on the ground of Article 6.1 (f) of GDPR. Our legitimate interest to process such personal data derives from our right to support and improve this Site and ensure that website functions properly and safely.

We will not disclose such personal data to any recipients. We will not transmit such persona data to third countries, i.e. outside of the EU and the EEA.

As data subject, in connection with the processing of such personal data you have the rights more fully described below in YOUR RIGHTS Section of this policy.

## LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

The law requires us to set out the legal grounds on which we process your personal data. We use your personal data for the purposes outlined above because:

- the personal data is required in order to enter into our contractual relationship with you or our client or fulfil our contractual obligation to you or our client;
- of our legitimate interests in the effective delivery of our services or products to you or our client;
- of our legitimate interests in the effective and lawful operation of our business, including, for example, in the effective direct marketing of our services or products to you or our client;
- of our legitimate interests in the effective and lawful operation of this Site.

## YOUR RIGHTS

You have several rights concerning your personal data processed by us. We would like to inform you that you have the right:

- to be informed by obtaining confirmation that we are processing your personal data;
- of access, to request a copy of the personal data we hold about you;
- to rectification, to ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- to erasure, to ask that we delete personal data that we hold about you in the situations more fully described in the GDPR;
- to restrict processing or restrict the way in which we use such personal data if you believe that there is no (longer a) lawful ground for us to process it and in any other situations more fully described in the GDPR;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on consent);
- to receive a copy of the personal data concerning you and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
- to object to our processing of your personal data for which we use legitimate interest as a legal basis, provided that you found yourself in exceptional situation, in which case we will cease the processing unless we have compelling legitimate grounds to continue processing; if we process your personal data for direct marketing purposes or for profiling you may object to our processing of your personal data for that purposes at any time without any restrictions.

In order to exercise any of your rights, you can send us a request, indicating the right you wish to exercise. Such request shall be sent to the following email address: [dpo@walstead-ce.com](mailto:dpo@walstead-ce.com).

You may also use these contact details if you wish to make a complaint to us relating to processing of your personal data by us.

If you are unhappy with the way we have handled your personal data or any query or request that you have raised with us, you have a right to complain to the Data Protection Authority ("DPA") in your jurisdiction. If you would like to be directed to the appropriate DPA, please contact us.

## SECURITY

We employ strict technical and organizational (security) measures to protect your personal data from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage both online and offline.

These measures include:

- training to relevant staff to ensure they are aware of our data protection obligations when handling personal data;
- administrative and technical controls to restrict access to personal data on a 'need to know' basis;
- technological security measures, including fire walls, encryption and anti-virus software;
- physical security measures, such as staff security badges to access our premises.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

#### DATA PROTECTION CONTACT

Our address and other contact details are available at this Site.

Our data protection dedicated e-mail address is: [dpo@walstead-ce.com](mailto:dpo@walstead-ce.com).

Questions, comments, or access requests regarding the processing of personal data of the users of this Site should be directed to the email address: [dpo@walstead-ce.com](mailto:dpo@walstead-ce.com).

Walstead Kraków reserves the right to take reasonable steps to authenticate the identity of any such individual seeking access to such personal data.

#### CHANGES TO THIS PRIVACY POLICY

We may change this policy from time to time to reflect changes to the products and services that we provide and how we process your personal data or use cookies from this Site. Any changes we may make to this policy in the future will be posted on this page. To let you know when we make changes to this policy, we will amend the revision date at the front page of this policy. The new modified or amended policy will apply from that revision date. Please check this policy frequently. Your continued use of this Site constitutes acceptance of such changes in this policy, except where further steps are required by applicable law.