



BQ Sp. z o.o. policy concerning personal data protection

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Rev. 02
Date: 21.09.2018

Prepared by: AK

Checked by: JP

Approved by: TD

BQ Sp. z o.o. company (hereinafter referred to as „the Company”) respects the rights of entities to privacy and protection of their personal data. Conducting our activities, we take into account the General Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. For this reason, we recognise the need of carrying out open and fair communication as well as collecting personal data (sometimes including sensitive personal data) to satisfy the needs of particular employees and customers of BQ Sp. z o.o. as well as to conduct our main manufacturing, commercial and service activity. We also recognise the need of confidentiality corresponding to it as well as the need to ensure relevant protection of information.

The controller of personal data within the meaning of the provision of Art. 4 sec. 7 of the abovementioned Regulation in reference to personal data of customers, employees, collaborators and External Companies is BQ Sp. z o.o. with its registered office at ul. Goleniowska 27, 70-840 Szczecin.

This document, as well as other documents connected with personal data protection, is available in the Company’s registered office at ul. Goleniowska 27, 70-840 Szczecin and/or on the Company’s official website: www.bq-electric.com.

According to the Data Protection Law, BQ Sp. z o.o. has introduced various procedural and technical security measures to protect personal data. Customers, employees, collaborators and External Companies realise that their personal data will be available only to a limited number of authorised persons to fulfil the abovementioned objectives. The persons having the right to process personal data have been appointed. They have relevant authorisations, and they have signed relevant declarations of confidentiality and professional secrecy.

Cooperation with External Companies who have access to personal data of customers, employees and collaborators is defined in relevant entrustment agreements of personal data processing. Such companies provide adequate level of protection of the data obtained. There is a possibility of carrying out an audit or inspection in a given company to check whether the data are properly stored and processed.

In BQ Sp. z o.o. company there is a designated control area in the office on the first floor of the Company’s registered office at ul. Goleniowska 27, 70-840 Szczecin. There is also a designated area with personal data of customers, employees, collaborators and External Companies on a disk in the Company’s computer system.

The following instructions have been created: „Instruction for handling expressions of consent for personal data processing and requests to cease processing of these data”, „Instruction for handling breaches of personal data protection and fulfilling an obligation to notify of security incidents” and „Instruction for managing an IT system”. They are available in the Company’s registered office, and they can be also made available for viewing in an electronic form at the express request of interested parties.

General principles of data protection in BQ Sp. z o.o.

BQ Sp. z o.o. handles any personal data in accordance with the principles listed below:

1. Personal data will be processed fairly and in accordance with the law.
2. Personal data will be collected, processed and used only within the scope which is necessary to fulfil the Company’s objectives.



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3. Personal data will be accurate and updated. Any errors will be corrected as quickly as it is possible, as soon as the Company becomes aware of them.
4. Personal data will be stored as long as necessary for the purpose of the Company's legitimate objective (or objectives).
5. Automated decision-making, including profiling, does not take place.
6. Due consideration will be given to respect for the rights of data subjects.
7. Relevant technical and organisational measures will be undertaken to prevent unauthorised or unlawful disclosure of personal data. Any personal data stored in an electronic form are on password-protected computers which can be accessed only by authorised users. Offices are closed after working hours, and access to them can be obtained only by an authorised personnel.
8. Personal data will not be transferred by the Company, unless it is required to fulfil the Company's objectives. All customers, employees, collaborators and External Companies have given their consent to it, making a free and voluntary decision expressed in writing in the form of a consent to personal data processing.

Application of the principles of data protection in BQ Sp. z o.o.

Every customer, employee, collaborator and External Company recognises the fact that the Company, including an external accounting and bookkeeping firm, persons rendering IT services and similar Companies collaborating with BQ Sp. z o.o., uses personal data in accordance with the law in connection with its legitimate interests.

Customers, employees, collaborators and External Companies voluntarily make their personal data available to BQ Sp. z o.o. to take part in the Company's activities, including sending and making the data available, personnel and payroll, accounting, IT and information settlements.

Engaging in other aspects of the Company's activity, customers, employees, collaborators and External Companies may make additional personal data available to BQ Sp. z o.o. These data include information which may disclose sensitive personal data. Using personal data may mean collection, recording, organisation, structuring and storage of data as well as similar activities performed on the data.

According to the Data Protection Law, customers, employees, collaborators and External Companies agree to using personal data by the Company for the Company's purposes, including situations in which:

- objectives connected with the Company's main activity are fulfilled: manufacturing, commercial and service objectives;
- these persons take part in all kinds of meetings and voluntary activities or projects;
- these persons make a decision to take part in a recorded or broadcasted meeting or presentation;
- these persons agree, if necessary, to transfer their personal data to the Companies collaborating with the Company located in other countries within the European Economic Area whose law ensures the level of personal data protection equivalent to the one applicable in Poland;
- images recorded by surveillance cameras are processed outside of the Company to ensure safety and protection of the employees and their property;
- personnel and accounting, accounting, IT and information documents are kept;
- contact data of persons in case of emergency are recorded;
- personal data of employees and collaborators (with a photograph) are used after a relevant authorisation to create the Company's website and business cards used for contacting persons outside of the Company, and they may be placed on the Company's bulletin board;

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- employees and collaborators take part in various tasks or hold other positions connected with placing their full name and the task on the bulletin board.

Application of the principles of data protection on the Company's official website

The technical condition for using the Company's official website is possession of an electronic device with Internet access and installed web browser. In the case of using some services, it is necessary to have an e-mail account on any server. Using the website is possible only via a web browser.

In order to fully benefit from functionality of some services available on the website, it is necessary to enable cookies. Small amounts of data may be stored using cookies. We use cookies to get to know what language was chosen by a guest/customer and set it when they visit the website once again. Cookies allow us to remember choices made by a guest/customer and provide additional possibilities improving user experience of the website.

When a guest/customer uses BQ Sp. z o.o. website, our cookies are sent to their web browser and placed on their computer. Using our website, you agree to using cookies and similar technologies. If one wants to erase them, it can be done using web browser settings. However, one should remember that without cookies, it may not be possible to make full use of all functions of our website. The manner of removing cookies may differ depending on a web browser. You can check help menu of your web browser to obtain detailed instructions.

Enforcement of personal data protection in BQ Sp. z o.o.

BQ Sp. z o.o. Policy Concerning Personal Data Protection is continuously available on the Company's website in a manner enabling the Users to obtain and record its content by printing or saving on a carrier at any time.

Every customer, employee, collaborator and External Company who expressed their consent to personal data processing in writing are aware that they have the right of access, the right to submit a request for erasure or restriction of the processing, the right to object to processing, the right to data portability as well as the right to correct any inaccuracies concerning their personal data possessed by the Company. They also understand that they can withdraw their consent concerning defined future uses of their personal data in the same manner in which they expressed their consent, that is in writing. If the consent to using personal data is withdrawn, it shall not affect compliance with the law of the processing which took place on the basis of the consent before its withdrawal. The Company may also have the right to further use of some personal data without such consent on the basis of legitimate objectives of maintaining information and managing it or on other lawful basis indicated in the Data Protection Law.

All abovementioned persons are aware of the right to lodge a complaint with a data protection authority in Poland, i.e. the President of the Office for Personal Data Protection.

BQ Sp. z o.o. secures personal data of customers, employees, collaborators and External Companies against making them available to unauthorised persons, and also against other disclosures or losses as well as against destruction or unauthorised modification of indicated data.

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It also implements relevant technical and organisational measures ensuring protection of the data processed, including safeguards of technical and programming nature, and signature of relevant entrustment agreements, if these data are processed by external companies.

Personal data of customers, employees, collaborators and External Companies may be transferred to entities entitled to receive these data under applicable law, including relevant judicial authorities.

Personal data will be stored for an indefinite period of time as long as the objectives indicated above, or other legitimate objectives are applicable. If a customer, employee, collaborator or representative of the External Company decides that they will not sign the „Consent for personal data processing”, the Company may not be able to undertake cooperation with them to the extent assumed before or it may not be able to assess their suitability for performing defined works or tasks in the Company or taking part in some aspects of the Company’s activity.

It may be that our Policy concerning data protection will change from time to time due to changes in our activity, law or character of the technology. If a change in the content of this document ever becomes necessary, we will revise it and issue a new version of the Policy which will be published on our official website and made available for viewing in the Company’s registered office at ul. Goleniowska 27, 70-840 Szczecin, so that customers, employees, collaborators and External Companies of BQ Sp. z o.o. always know what information is collected and how it is used. Please check this website from time to time.

Legal basis:

1. 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).
2. Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2018, item 1000).
3. Copyright and Related Rights Act of 4 February 1994 (Journal of Laws of 1994, No. 24, item 83).

Related documents:

1. INS_001 Instruction for handling breaches of personal data protection and fulfilling an obligation to notify of security incidents.
2. INS_002 Instruction for handling expressions of consent to personal data processing and requests to cease processing of these data.
3. INS_003 Instruction for managing an IT system.
4. FOR_001 Training course register.
5. FOR_002 Report on an internal audit.

Appendices:

1. POL_001-APX_001 APP.1 Consent for personal data processing – EMPLOYEE.
2. POL_001-APX_002 APP.2 Consent for personal data processing – COLLABORATOR (EXTERNAL COMPANY).
3. POL_001-APX_002A APP.2A Consent for personal data processing – EXTERNAL COMPANY.
4. POL_001-APX_003 APP.3 Consent for personal data processing – CUSTOMER.
5. POL_001-APX_004 APP.4 Authorisation to process personal data.



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6. POL_001-APX_005 APP.5 Model entrustment agreement of personal data processing.
7. POL_001-APX_006 APP.6 Description of a supervised area.
8. POL_001-APX_007 APP.7 Model analysis concerning the GDPR.
9. POL_001-APX_008 APP.8 Model letter to External Companies concerning appointment/indication of the DPO.
10. POL_001-APX_009 APP.9 Summary of the DPOs from External Companies.
11. POL_001-APX_010 APP.10 Request to cease personal data processing.
12. POL_001-APX_011 APP.11 The Data Controller's letter on ceasing personal data processing.
13. POL_001-APX_012 APP.12 Register of persons authorised to process personal data of BQ Sp. z o.o.
14. POL_001-APX_013 APP.13 Withdrawal of an authorisation to process personal data.
15. POL_001-APX_014 APP.14 Consent for additional personal data processing – EMPLOYEE.
16. POL_001-APX_015 APP.15 Consent for additional personal data processing – COLLABORATOR EXTERNAL COMPANY.
17. POL_001-APX_016 APP.16 General information clause.

Revision No.	Date of introduction	Description of changes
00	23.05.2018	Creation and introduction of the document.
01	11.07.2018	Merger of „BQ Sp. z o.o. Policy concerning personal data protection” with „BQ Sp. z o.o. code of conduct concerning personal data protection” (after the Analysis carried out on 09.07.2018). Addition of related documents and appendices which have been created from 23.05.2018 to the list.
02	21.09.2018	Add new appendices: no.14, no.15, no.16.

	APPENDIX No. 016 to BQ Sp. z o.o. policy concerning personal data protection GENERAL INFORMATION CLAUSE	Page: 1 / 2 Rev. 00 Date: 21.09.2018
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Legal basis:

1. 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)- is called below as GDPR.

2. Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2018, item 1000).

In accordance with articles 13 and 14 of the GDPR, from May 25, 2018, you had the opportunity to read the information clause regarding the protection of your data in BQ Sp. z o.o. for example during a personal interview or contact with representatives of BQ Sp. z o.o., at the moment of transferring your data to us by third party, when using our website, signing a contract with us, agreeing to the processing of your personal data or simply reading our "BQ Sp. z o.o. policy concerning personal data protection". However, we have prepared this additional document so that you have all the data in one place, about how BQ Sp. z o.o. fulfills our obligations resulting from the GDPR.

We encourage you to analyze it and assure you that we are for your disposal if you have any questions or would like to discuss in detail the important aspect of the protection of your data carried out by BQ Sp. z o.o.

The controller of personal data

The controller of your personal data is BQ Sp. z o.o. with our registered office at Goleniowska 27, 70-840 Szczecin.

There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally, at the registered office of the Company, or send your correspondence to the above-mentioned address or email address: td@bq-electric.com. You can also find more information about the protection of personal data on our website www.bq-electric.com in the "Privacy policy" tab.

Purposes and legal ground for the processing

The purposes of processing your data in BQ Sp. z o.o are:


- 1) satisfying your needs (as our employee or client) and our mutual obligations;
- 2) carrying out the process of recruitment;
- 3) fulfilling the conditions set out in the agreement signed between us;
- 4) considering of applications submitted by you (or on your behalf) and payment of liabilities;
- 5) processing of services and orders placed by you (including complaints) related to the main activities of the Company: commercial, production and service;
- 6) keeping records by us (in HR, accountant, accounting and IT documentation);
- 7) using of our website;
- 8) providing you an information about our services and offers;
- 9) maintaining electronically contact (e.g. via e-mail);
- 10) other legitimate purposes related to the activity of the Company.

Your personal data may be processed in the BQ Sp. z o.o. Company when:

- 1) processing is necessary for the performance of a contract to which you are party or in order to take steps at your request to entering into a contract (point (b) of Article 6(1) GDPR);
- 2) processing is necessary for compliance with a legal obligation to which the controller is subject (point (c) of Article 6(1) GDPR);
- 3) processing is necessary in order to protect the vital interests of you or of another natural person (point (d) of Article 6(1) GDPR);
- 4) processing is necessary for the performance of a task carried out in the public interest (point (e) of Article 6(1) GDPR);
- 5) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (point (f) of Article 6(1) GDPR).

Whenever the processing of your data has a legal basis or legitimate interests - you will be informed about them. When we have your data from a third party, you will be informed what is the source of your data and what categories of your data we have.

In other cases, you can give consent to the processing of your personal data in one or more specific objectives (point (a) of Article 6(1) GDPR) which you have the right to withdraw your consent at any time.

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Recipients of the personal data

The recipient of your personal data in addition to BQ Sp. z o.o. may turn out: public institutions, to which the controller will be obliged to provide such data and additionally for example: employees of the data controller, who are explicitly designated by a written mandate of the controller to process personal data; external accounting and HR office; people providing IT services; companies cooperating with BQ Sp. z o.o.; courier companies; a company (and they are a controller for this processing) which supervising monitoring outside the facility where is our office. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of persons, companies and institutions to whom your data is transferred (and if it is necessary - signing appropriate data processing agreement).

If there is such a need that your data to be transferred to companies cooperating with our Company, located in other countries (within the European Economic Area, whose law provides an equivalent level of protection of personal data occurring in Poland) you will be informed about it and you will have the opportunity to agree or not.

The storage period of your data

Your data collected by BQ Sp. z o.o. will be stored as long as it is necessary and it is determined individually for a given process or related to the legal requirements applicable in Poland in relation to a given activity (for example: the period of storage of data related to the execution of orders- is setting by the controller; but the period of storage for personal data of an employee after finishing employment- is imposed by the Polish legislator).

Your rights:

You have the right to:

- 1) to request from the controller access to your data and to receive copy of them;
- 2) rectification of your data;
- 3) erasure of your data;
- 4) restriction of processing concerning the data subject;
- 5) to object to processing;
- 6) to data portability;
- 7) to lodge a complaint with a supervisory authority (address in Poland: Urząd Ochrony Danych Osobowych, Stawki 2, 00-193 Warsaw);
- 8) to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal (when the processing is based on point (a) of Article 6(1) GDPR or point (a) of Article 9(2) GDPR);

In BQ Sp. z o.o. do not exist of automated decision-making, including profiling.

Information about provision of personal data

Sometimes the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, then you should provide your data because if you do not do this, it may prevent, hinder or significantly limit the scope of cooperation in a given area. Sometimes it can also be simply obligatory.

Data provided by you by giving consent is voluntary.

Further process the personal data

If BQ Sp. z o.o. intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller will provide you this information.

The above rules apply from May 25, 2018.
The controller of personal data BQ Sp. z o.o.