

 BQ SPÓŁKA Z O.O.	<b>BQ Sp. z o.o. policy concerning personal data protection</b>	Page: 1 / 11 Rev. 06 Date: 01.09.2021
<b>Prepared by: AK</b>	<b>Checked by: PL</b>	<b>Approved by: TD</b>

## TABLE OF CONTENTS:

LEGAL BASIS:.....	2
ABOUT US AND GDPR.....	2
PERSONAL DATA CONTROLLER .....	2
PERSONAL DATA PROCESSING .....	2
GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING IN BQ SP. Z O.O. ....	3
APPLICATION OF THE PRINCIPLES OF DATA PROTECTION IN BQ SP. Z O.O. ....	4
MONITORING .....	5
APPLICATION OF THE PRINCIPLES OF DATA PROTECTION ON THE COMPANY’S OFFICIAL WEBSITE ...	6
LINKS TO OTHERS SITES AND SOCIAL MEDIA .....	7
CLOUD DATA PROCESSING .....	9
MARKETING .....	9
SUMMARY .....	9
CONTENTIOUS MATTERS.....	9

Prepared by: AK

Checked by: PL

Approved by: TD

**LEGAL BASIS:**

- 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 - GDPR).
- Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2019, item 1781).
- The law on telecommunications Act of 16 July 2004 (Journal of Laws of 2021, item 576).
- Electronically Supplied Services Act of 18 July 2002 (Journal of Laws of 2020, item 344).
- Copyrighting and Related Rights Act of 4 February 1994 (Journal of Laws of 2021, item 1062).
- Labor Code Act of 26 June 1974 (Journal of Laws of 2021, item 1162).
- Others- mentioned in related documents and appendix.

**ABOUT US AND GDPR**

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 (hereinafter referred to as „GDPR”). For this reason, we recognise the need of carrying out open and fair communication as well as collecting personal data (if necessary: 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 datas and information.

The policy is of a general nature and lays down the most important matters connected with personal data processing. This policy is supplemented by relevant detailed instructions, rules or/and information clauses which User receives (will be able to get acquainted) at the moment his/her personal data (about him/her) will be collected in different situations and individual service.

**PERSONAL DATA CONTROLLER**

We are Your Personal Data Controller. Your personal data is processing in our company (HR-human resources), on our website (cookies) and other websites which present our company (e.g. social networking platforms).

Our contact details: **BQ Sp. z o.o. with the registered office on Dąbska street 70, 70-786 Szczecin.** Contact phone number: +48 693 418 280 email: [td@bq-electric.com](mailto:td@bq-electric.com). Our website: [www.bq-electric.com](http://www.bq-electric.com).

The following document as well as other connected with the protection of the personal data documents is available in the office of the Company on Dąbska street 70, 70-786 Szczecin and/or on our official website: [www.bq-electric.com](http://www.bq-electric.com).

**PERSONAL DATA PROCESSING**

Using your personal data may mean collection, recording, organisation, structuring, and storage, archiving, erasure of data as well as similar activities performed on the data.

According to the Data Protection Law, BQ Sp. z o.o. has introduced various procedural and technical security measures to protect personal data. We want you to know that your personal data will be available only to a limited number of authorised persons to fulfill the abovementioned objectives. The persons having the right to process personal data have been appointed. They have

 <b>BQ SPÓŁKA Z O.O.</b>	<b>BQ Sp. z o.o. policy concerning personal data protection</b>	Page: 3 / 11 Rev. 06 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

relevant authorisations, and they have signed relevant declarations of confidentiality and professional secrecy.

Cooperation with external companies who have access to your personal data is defined in relevant entrustment agreements of personal data processing. Such companies process the data on our documented instruction and 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 Dąbska street 70, 70-786 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.

## **GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING 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 or due to our legitimate interest.
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 (objectives). We restrict the storage period of the personal data according to the laws and only for the necessary period to implement the objectives of the data processing, unless special circumstances may extend time of storage. We give a concretized data storage period where it is possible.
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 to third party, unless it is required to fulfil the Company's objectives or legitimate interests.

 BQ SPÓŁKA Z O.O.	<b>BQ Sp. z o.o. policy concerning personal data protection</b>	Page: 4 / 11 Rev. 06 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

9. 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 consent to personal data processing.
10. The company always have a legal basis for processing personal data if processing is without the consent.

## YOUR RIGHTS UNDER GDPR

As our customer, employee, collaborator, external company or another person, which gave us a consent to process your personal data or your data is processed on another legal basis, we want you to know that you have the right to:

- to request from the controller access to your data and to receive copy of them,
- to submit the application for rectification or erasure of your data that you made available for us (in certain circumstances),
- to object to processing of your data that you made available for us (e.g. for marketing), and also object processing of your data concerning legal basis due to special situation,
- to data portability of your data that you made available for us and to obtain your personal data from your Controller in structured and commonly used machine-readable format. You can send your data to another Controller,
- to demand rectification of the data, the right to correct any inaccuracies of your personal data processed by the Company.
- to lodge a complaint with a supervisory authority of GDPR (more about it you can find in CONTENTIOUS MATTERS in this Policy).

We also want you to know that you can revoke your consent on data processing at any time according to the consent with specified future using of your personal data- in the same way you gave your consent. If your consent was revoked it doesn't have an influence on lawfulness of data processing before it withdrawal.

However The Company may have permissions to use further some personal data without such consent on basis on legitimate purposes to consisting of maintain and administrate information or on any other lawful basis specified in data protection law.

If you decide to not sign or not agree to the approval „Personal data processing agreement” or you will not give us a clear affirmative action, when it is necessary, the Company may not be able to contact or cooperate with you at all or in the previously assumed range or we will be unable to evaluate your capability for specified work and tasks in the Company or take part in some activities of the Company.

Your personal data can be shared with authorized entities to receive them under applicable law in particular for competent judicial authorities.

## APPLICATION OF THE PRINCIPLES OF DATA PROTECTION IN BQ SP. Z O.O.

As a customer, employee, collaborator, external company or another natural or legal person, you voluntarily make available your personal data for BQ Sp. z o.o., to be able to take part in activities of the Company (human resources and wage settlements, accountings or informational and IT activities).

 BQ SPÓŁKA Z O.O.	<b>BQ Sp. z o.o. policy concerning personal data protection</b>	Page: 5 / 11 Rev. 06 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

You can make available additional personal data for BQ Sp. z o.o. to take part in other aspects of Company's activities. This data may include revealing of sensitive personal data.

We want you to know that we will use your personal data according to previously mentioned principles, including the situations when:

- we pursue objectives related to the basic activity of the Company: production-trade-service,
- we organise interviews,
- we cooperate together (e.g. the employment contract, other civil-legal contracts),
- we contact with you for marketing purposes or for establishing the conditions of our cooperation,
- you take part in all sorts of meetings and also in all sorts of voluntary activities or projects,
- you decide to take part in recorded and broadcast meeting, gathering, presentation,
- you consent that if it is necessary, we may pass your personal data to the companies which cooperate with the Company and are in the countries of the European Economic Area with the extended personal data protection law as in Poland,
- you consent that if it is necessary, we may pass your personal data to the other countries outside of the European Economic Area (in such case the processing of data will be based on your explicit consent (art. 49, section 1, letter (a) of GDPR) and/or according to the international standards of safe cooperation or according to the signing standard contractual clauses or binding corporate rules between companies (art. 46 of GDPR)),
- your image is processed on monitoring inside and outside of the Company to ensure security and protection of employees and property,
- there are HR, wage, accounting, informational and IT documents which also have your personal data,
- your data was taken/given in case of an emergency,
- your personal data (including your photo) is used according to your consent in creating Company's official website, business cards to contact with people outside the Company and also can be placed on informational board in the Company,
- you take part with us in different sorts of activities or you have a responsible function that may include placing your name and surname or task on informational board.

## MONITORING

As a customer, employee, collaborator, external company or another natural or legal person, entering, being on the property at Dąbska street 70 (70-786 Szczecin), you voluntarily provide us with your personal data, which is recorded on monitoring.

Video surveillance includes corridors, public rooms and places inside the company and the area directly adjacent to the building (at the front of the building). Monitoring does not include sanitary rooms, cloakrooms or canteen. All rooms at the company's headquarter are described, and in the places covered by the surveillance of the cameras, there are appropriate markings with pictograms of the vision camera, with a short note containing the most important information about the Administrator of this datas, the purposes and period of their processing, legal grounds for processing , Your rights and other additional messages. The extension of this information can be found in the Information clause on monitoring.

Prepared by: AK

Checked by: PL

Approved by: TD

We would like to emphasize that monitoring is applied and the image is recorded and used only for the analysis of incidents of violation of the law. Processing is necessary for the purposes of the legitimate interests pursued by the Administrator or by a third party (Article 6 (1) (f) of the GDPR), which is to ensure your safety in the monitored area and protect property (yours and BQ Sp. z o.o.'s) located in the monitored area.

Entering the zone supervised by monitoring is voluntary and is not a statutory or contractual requirement or a condition for concluding a contract. No entry in the supervised area, however, it may prevent, hinder or significantly limit the scope of cooperation between us.

Image recordings are processed by the Administrator only for the purposes for which they were collected.

### **APPLICATION OF THE PRINCIPLES OF DATA PROTECTION ON THE COMPANY'S OFFICIAL WEBSITE**

The technical condition of using our official website is electronic equipment with access to Internet and downloaded web browser. In some cases you may need to have an e-mail account on any Internet server (e.g. to contact with BQ Sp. z o.o.).

On our website you will find contact details of our company, as well as of individual persons from designated departments. These people are trained in how to process your personal data if you want to give it to us. The details of contact persons from the Company's website (together with their photos) have been placed on our website with their permission.

On our website (in the CAREERS tab) you can find information about current vacancies for BQ Sp. z o. o. By writing to us on the e-mail given there you can submit your application documents. You can also find our job offers for example on LinkedIn (we are not LinkedIn Administrators. If you want to use it before giving any data there, read their Privacy and Personal Data Processing Policy and make an informed decision to give them your data). Your personal data as a potential job candidate may be collected on that website. In places where you can find information about the possibility of applying to us for work (e.g. on our website or social networking site) we will also place detailed information about the processing of personal data for recruitment and employment purposes.

If you learn about our recruitment from another source and send an e-mail to **rekrutacja@bq-electric. com**, we will send you information about the processing of personal data for recruitment and employment purposes (information clauses).

### **COOKIES**

You have to enable **cookies** if you want to use all functions of some services on our website. Small cookies' data can be stored (e.g. IP address, URL address, domain name, device identifier, web browser type, web browser language, quantity of clicks, period of time on specific page, date and hour when you used our website or other informations).

Cookies are not harmful for you and your devices; they don't have an impact on your computer, tablet or smartphone. They cannot change configurations on your device nor change setting and programs on your devices.

Cookies allow us to remember your choices and give you more specific options for your comfortable using of our website. Cookies allow us to remember choices you make and provide enhanced personal features for browsing our website, content improvement and user guidance.

Prepared by: AK

Checked by: PL

Approved by: TD

You can allow to access and store data using settings on your device or configuration services. You consent to allow us to use cookies when you set your browser according to your preferences.

More information about cookies you can find here [www.aboutcookies.org\(in](http://www.aboutcookies.org(in) English) and here <http://wszystkoociasteczkach.pl> (in Polish).

If you want to know more about using cookies and period of it storing, we encourage you to analyze the article below:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=pl>

The way to delete cookies may vary of a web browser you use. You can check the light table of your browser to find specific instructions. Examples are shown below:

Sample web browser	Links with the information how to delete cookies
CHROME	<a href="https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&amp;hl=pl">https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&amp;hl=pl</a>
EDGE	<a href="https://support.microsoft.com/pl-pl/help/10607/microsoft-edge-view-delete-browser-history">https://support.microsoft.com/pl-pl/help/10607/microsoft-edge-view-delete-browser-history</a>
FIREFOX	<a href="https://support.mozilla.org/pl/kb/usuwanie-ciasteczek-i-danych-stron-firefox?redirectslug=usuwanie-ciasteczek&amp;redirectlocale=pl">https://support.mozilla.org/pl/kb/usuwanie-ciasteczek-i-danych-stron-firefox?redirectslug=usuwanie-ciasteczek&amp;redirectlocale=pl</a>
INTERNET EXPLORER	<a href="https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies</a>
OPERA	<a href="https://help.opera.com/en/latest/web-preferences/#cookies">https://help.opera.com/en/latest/web-preferences/#cookies</a>
SAFARI	<a href="https://support.apple.com/pl-pl/guide/safari/sfri11471/mac">https://support.apple.com/pl-pl/guide/safari/sfri11471/mac</a>

Remember however that you may be unable to use all the functions of our website without cookies- it may cause loss of certain functions and make it difficult or impossible to fully use capabilities of our website.

Remember also that even if you choose to disable cookies in your browser you can return data collection options in your web browser (in the similar way you disabled them).

By using our web site you are consenting to use cookies and similar technologies and accept the personal data protection policy of BQ Sp. Z o. o.

Remember that Content of our web site do not constitute an offer referred to the civil code but for information only.

## LINKS TO OTHERS SITES AND SOCIAL MEDIA

Our website **may contains** links to other websites, including plug-ins to social networking sites (as described above, for example LinkedIn). In this case, we are the Controller of your data on our website and of your data provided directly to us or to which you have given us access, on the website you accessed or were redirected to.

If you are redirected from our website to another website and/or portal, our responsibility will only exist at the stage of their collection and transmission to that external website (we are then **co-controllers** of your personal data) and will include the automatic "transfer" of basic data about you (usually only: IP address and your browser ID). You do not have to be logged in or registered at specific social networking site for your data to be transferred there. When you browse our site, the

Prepared by: AK

Checked by: PL

Approved by: TD

social network (if you are redirected from our site) establishes a direct connection to your search engine. Through this, the social network receives, among others information about the ID of the device from which you visited our site and/or your IP address.

**We are not** the Controller of your data in relation to other than ours websites and portals and are not responsible for the privacy practices of those sites (even if links to them are on our website or there would be a reference to [www.bq-electric.com](http://www.bq-electric.com) from that website/portal).

We recommend that you read the privacy information on the websites you visit. Please read the privacy policy of each website you visit carefully before you provide any personal information on these pages.

When third party social network plugins are used on our website or fan pages, they will be marked with commonly known social network icons (e. g. Facebook and "Like it"). With the help of these functions, you can share individual content with your friends on the social networks concerned or recommend it. Your clicking on such icon will be interpreted by us as consenting to the transfer to this portal/network of your data previously described and/or other data required to fulfill your request.

If you are logged in to a social networking site, this site automatically assigns your visit to your profile. Also when you use social plugins and e. g. you recommend our product or service, the social network can assign this information to your profile. If you do not want the social networking site to assign a visit to our sites to your particular user account, you should log out of that social networking site for the duration of your use of our website.

We would also like to inform you that most social networking sites and well-known international companies (e. g. Facebook, Instagram, Google) has its own servers in the United States and therefore your data is transferred there. If the processing of your data is based on international standards of secure cooperation or after signing standard contractual clauses or adopting binding corporate rules, you can be assured that your data is protected at the same level as in the European Economic Area. However, if neither of these rules are followed, you can personally decide whether you want to consent to your data being transferred and processed outside the European Economic Area (art. 49, section 1, letter (a) of GDPR). It may also turn out that e.g. your data can be transferred there when it will be necessary for the conclusion or performance of the contract (art. 49, section 1, letter (b) and/or (c) of GDPR). Other cases are specified in art. 49, section 1, letter (d) up to (g) of GDPR.

This Policy applies only to **[www.bq-electric.com](http://www.bq-electric.com)** and to the data you have provided to us directly (in person, by giving us consent or in any other electronic form) or that we have obtained from you when you visit our site (including: cookies).

With regard to the use of our website and the data you provide to us through another website or in person, the basis for the processing of your data is your consent (in the form of a statement or explicit confirmation action) - art. 6, section 1, letter (a) of GDPR; and/or to pursue legitimate interests of our Company, such as improving the operation of our website, promoting knowledge about our company and our offer, expanding our own knowledge, conducting analyses and statistics, conducting marketing activities (if so: you will be additionally informed about it)-art. 6, section 1, letter (f) of GDPR.

It is possible for us to process your personal data on a different basis than the two given here e.g. when you consent to the transfer of your data outside the European Economic Area (art. 49, section 1, letter (a) of GDPR).



 BQ SPÓŁKA Z O.O.	<b>BQ Sp. z o.o. policy concerning personal data protection</b>	Page: 9 / 11 Rev. 06 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

## CLOUD DATA PROCESSING

It may happen that certain data will be processed in the cloud (e.g. One Drive, Dropbox). Perhaps we will create an account or we will download data from some cloud solution.

If it is BQ Sp. z o.o. will process data in some cloud solution - we will take care to have appropriate entrustment agreements signed (when necessary) and we will check whether the data processing will take place on the basis of the international standards of safe cooperation or according to the signing standard contractual clauses or binding corporate rules.

If, for example, as our employee, associate, customer, you want to use some cloud solution and you want to share, check, download (or perform any other data operations in the cloud solution), always read the Privacy Policy for a specific solution/application. Before you share any data (yours or company data), check the necessity and correctness of such action. Before you download any data (e.g. files), check if it is from trusted sources.

## MARKETING

Pursuant to your additional and optional consent we have a right to send marketing information on a provided email (or other technical means of communication on which you have agreed). You may revoke such consent at any time. The legal basis for processing your personal data in case of your consent you can find in Electronically Supplied Services Act of 18 July 2002 (Art. 10) and the Law on telecommunications of 16 July 2004 (Art. 172).

## SUMMARY

Personal Data Protection Policy of BQ Sp. z o.o. is continuously available on the official website of the Company in a way that enables you to obtain and consolidate it. You can print it or download at any time.

From time to time our Data Protection Policy may change in accord of changes in our company, in the law or in technologies. If ever there was a change in the content of the policy we would revise it and release a new policy on our official website [www.bq-electric.com](http://www.bq-electric.com) and make it available in the Company's office on Dąbska street 70, 70-786. We encourage you to check that document from time to time.

By using our website (or our social networking profiles) you can collect materials presented only for personal, private and non-commercial purposes (except materials used by journalists) preserving all copyrighting information or any other information of reserved character for such materials.

It is not allowed without the written authorization given by BQ Sp. z o.o. to display, transmit, modify, post on other websites or distribute or commercially exploit the content of the website, which applies to both texts and photos.

## CONTENTIOUS MATTERS

We encourage you to contact with us if you believe that your personal data has been processed in a manner inconsistent with the GDPR. You can contact us via email: [td@bq-electric.com](mailto:td@bq-electric.com), via phone: +48 693 418 280, via letter or personally in the registered office of the Company on Dąbska street 70, 70-786 Szczecin.

Remember, that you also have the right to file a complaint to Personal Data Protection Authority in Poland, the Office of the President of the Personal Data Protection (Stawki street 2, 00 – 193 Warszawa), in case if cooperation with the Company didn't bring you satisfactory results.

 BQ SPÓŁKA Z O.O.	<b>BQ Sp. z o.o. policy concerning personal data protection</b>	Page: 10 / 11 Rev. 06 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

#### **Related documents:**

1. INS\_001 Instruction for handling breaches of personal data.
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. INS\_004 Instructions regarding the scope of information and personal data in personnel documents.
5. INS\_005 Supervision of personnel documentation (including all related attachments).
6. INS\_007 Monitoring.
7. PRO\_004-APX\_004 Training course register.
8. PRO\_002-APX\_003 Report on an internal audit.

#### **Appendices:**

1. POL\_001-APX\_001 APP.1 Consent for personal data processing – EMPLOYEE.
2. POL\_001-APX\_001A APP.1A Consent for personal data processing – TRAINEE.
3. POL\_001-APX\_002 APP.2 Consent for personal data processing – COLLABORATOR (EXTERNAL COMPANY).
4. POL\_001-APX\_002A APP.2A Consent for personal data processing – EXTERNAL COMPANY.
5. POL\_001-APX\_003 APP.3 Consent for personal data processing – CUSTOMER.
6. POL\_001-APX\_004 APP.4 Authorisation to process personal data.
7. POL\_001-APX\_005 APP.5 Model entrustment agreement of personal data processing.
8. POL\_001-APX\_006 APP.6 Description of a supervised area.
9. POL\_001-APX\_007 APP.7 Model analysis concerning the GDPR.
10. POL\_001-APX\_008 APP.8 Model letter to external companies concerning appointment/ indication of the DPO.
11. POL\_001-APX\_009 APP.9 Summary of the DPOs from external companies.
12. POL\_001-APX\_010 APP.10 Request to cease personal data processing.
13. POL\_001-APX\_011 APP.11 The Data Controller's letter on ceasing personal data processing.
14. POL\_001-APX\_012 APP.12 Register of persons authorised to process personal data of BQ Sp. z o.o.
15. POL\_001-APX\_013 APP.13 Withdrawal of an authorisation to process personal data.
16. POL\_001-APX\_014 APP.14 Consent for additional personal data processing – EMPLOYEE.
17. POL\_001-APX\_014 APP.14A Consent for additional personal data processing – TRAINEE.
18. POL\_001-APX\_015 APP.15 Consent for additional personal data processing – COLLABORATOR EXTERNAL COMPANY.
19. POL\_001-APX\_016 APP.16 General information clause.
20. POL\_001-APX\_016A Zał.16A Information clause for Customers, Suppliers and Contractors.
21. POL\_001-APX\_016B Zał.16B Information clause for marketing.
22. POL\_001-APX\_016C Zał.16C Information clause Our website.
23. POL\_001-APX\_016D Zał.16D Information clause Social media.
24. POL\_001-APX\_017 APP.17 Authorization to manage keys.
25. POL\_001-APX\_018 APP.18 Register of persons authorized to manage keys in BQ Sp. z o.o.
26. POL\_001-APX\_019 APP.19 Data protection risk assessment with register of processing action.
27. POL\_001-APX\_020 Zał.20 Designation of the monitored area.
28. POL\_001-APX\_021 Zał.21 Information clause on monitoring.
29. POL\_001-APX\_022 Zał.22 Authorization to supervise monitoring.




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

Page: 11 / 11  
Rev. 06  
Date: 01.09.2021

Prepared by: AK

Checked by: PL

Approved by: TD

 BQ SPÓŁKA Z O.O.	ANNEX No 016 to Policy BQ Sp. z o. o. concerning the protection of personal data  GENERAL INFORMATION CLAUSE	Page: 1 / 2 Rev. 04 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

#### Legal basis:

- 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 - GDPR).
- Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2019, item 1781).

## PERSONAL DATA CONTROLLER

The controller of your personal data is BQ Sp. z o.o. with our registered office at Dąbska 70 Street, 70-786 Szczecin. There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally (by calling the telephone number: +48 693418280), or send your correspondence to the above-mentioned registered office address or email address: [td@bq-electric.com](mailto:td@bq-electric.com). You can also find more information about the protection of personal data on our website [www.bq-electric.com](http://www.bq-electric.com) in the "Privacy policy" tab.

## PROCESSING PURPOSES

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

- 1) to satisfy your needs (as e. g. The customer, supplier, contractor) and our mutual obligations;
- 2) to fulfill the conditions set out in the contract signed between us;
- 3) fulfilment of the conditions set out in the contract signed between us - if applicable to you;
- 4) for the Company's administrative purposes in the exercise of our legitimate interest - if this is relevant to our business;
- 5) to consider requests made by you (or on your behalf) and the payment of benefits and liabilities - if it concerns you;
- 6) the execution of services and orders placed by you (including complaints) related to the main activity of the Company: trade, production and service - if it concerns you;
- 7) ensuring the safety and protection of property (yours and BQ Sp.z o.o.'s) through the supervision of video monitoring in the company's headquarter and in front of the building;
- 8) to keep human resources, accounting and IT records - if it concerns you;
- 9) using our website, if it concerns you;
- 10) providing information in connection with the use of social networking sites, if it concerns you;
- 11) providing you with information about our services, offers, orders, if applicable;
- 12) undertaking marketing activities, if you agree;
- 13) maintaining electronically contact (e. g. by e-mail, by phone) - according to the form provided, if it concerns you;
- 14) for archival and evidentiary purposes which pursue a legitimate interest in preserving information in the event of a legitimate need or obligation to prove facts - if this concerns our cooperation;
- 15) for the possible establishment, investigation or defense against claims - if this concerns our cooperation;
- 16) for analytical and statistical purposes (e. g. to better match services to your needs, product development, optimisation of service processes, gathering cross-cutting knowledge, financial analysis, etc. ) - if it concerns you;
- 17) to study customer satisfaction - if applicable;
- 18) other legally justified objectives or obligations related to the Company's business and our cooperation.

## LEGAL BASIS


Your personal data may be processed 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 and/or points (b) and (c) of Article 49(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) and/or the transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case (point (g) of Article 49(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 and/or point (f) of Article 49(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 and/or point (d) of Article 49(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) and/or the transfer is necessary for the establishment, exercise or defence of legal claims e.g. when transferring personal data to third countries (point (e) of Article 49(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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR) which you have the right to withdraw your consent at any time.

 BQ SPÓŁKA Z O.O.	ANNEX No 016 to Policy BQ Sp. z o. o. concerning the protection of personal data  GENERAL INFORMATION CLAUSE	Page: 2 / 2 Rev. 04 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

## DATA RECIPIENTS

The recipient of your personal data except BQ Sp. z o. o. may also be: Controller`s employees, having appropriate authorization to process personal data - data circulation inside the Company or external accounting and human resources office; persons providing IT services; companies cooperating with BQ Sp. z o. o. ; companies from which the Company obtained e. g. co-financing; courier companies, as well as e. g. public bodies to which the controller will be obliged to provide such data by law, etc. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of the persons, companies and institutions to which your data are transferred (and, if necessary, signing appropriate entrustment agreements).

If there is a need for your data to be transferred to the Companies cooperating with the Company, located in other countries, within the European Economic Area, whose law provides an equivalent level of protection of personal data in Poland, you will be informed about it and given the opportunity to express your consent.

If there is a need to transfer your data to Companies outside the European Economic Area, we will work with such Companies on the basis of international standards for secure cooperation or by signing standard contractual clauses between us and the company or by adopting binding corporate rules (articles 45 to 47 GDPR). You will also be informed about this. In any other cases you will have the opportunity to agree with it (point (a) of Article 49(1) GDPR).

## DATA RETENTION PERIOD

Your data collected by BQ Sp. z o. o. are stored until such time 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 storage period for contracts or data related to the execution of orders is different - determined by the Controller; and different for situations imposed by the legislator) or until your consent is withdrawn.

## 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 that you made available for us;
- 3) erasure of your data that you made available for us;
- 4) restriction of processing concerning the data subject that you made available for us;
- 5) to object to processing of your data that you made available for us;
- 6) to data portability of your data that you made available for us;
- 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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR).

The place of making your data available to you (if necessary) will be the office of the Controller in Szczecin at Dąbska 70 Street, 70-786 Szczecin or other place or form jointly agreed with the Controller.

Company BQ Sp. z o.o. does not carry out automated decision making, including profiling.


## DATA PROVISION

The provision of personal data by you may prove to be a statutory or contractual requirement or a condition for concluding a contract, in which case your failure to provide data may prevent, hinder or significantly limit the scope of cooperation in a given area. It can also be just mandatory. The data you provide by giving your consent is voluntary, although it may also be necessary.

## PROCESSING FOR OTHER PURPOSE THAN COLLECTED

If BQ Sp. z o. o. will plan to further process your personal data for a purpose other than that for which it was collected, you will be informed before such further processing.

Data Controller BQ Sp. z o.o.

 BQ SPÓŁKA Z O.O.	ANNEX 003 FOR INSTRUCTION 005 INFORMATION CLAUSE FOR JOB APPLICANT		Page: 1 / 2 Rev. 06 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD	

#### Legal basis:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th 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 - GDPR).
- Personal Data Protection Act of 10th May 2018 (Journal of Laws of 2019, item 1781).
- The Labour Code of 26th June 1974 (Art. 22 <sup>1a</sup>(1, 2, 5); Art. 22 <sup>1a</sup> (1); Art. 22 <sup>1b</sup> (1), (Journal of Laws 2021, item 1162).
- § 3 Regulation of the Minister of Family, Labour and Social Policy of 10th December 2018 on employee documentation (Journal of Laws of 2018, item 2369).

## PERSONAL DATA CONTROLLER

The controller of your personal data is BQ Sp. z o.o. with our registered office at Dąbska 70 Street, 70-786 Szczecin. There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally (by calling the telephone number: +48 693418280), or send your correspondence to the above-mentioned registered office 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](http://www.bq-electric.com) in the "Privacy policy" tab.

## PROCESSING PURPOSES

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

- 1) carrying out the recruitment process ;
- 2) for the Company's administrative purposes - keeping our HR, accounting and IT records;
- 3) providing information in connection with the recruitment process;
- 4) maintaining electronically contact (e. g. by e-mail, by phone - according to the form provided);
- 5) consideration of applications made by you (or on your behalf) - if it concerns you;
- 6) using our website, if it concerns you;
- 7) processing your data in connection with the use of social networking sites - if applicable;
- 8) providing us with information through social networking sites (to us) - if you want to use this form of contact/communication;
- 9) for archival and evidentiary purposes that pursue a legitimate interest in securing information in the case of a legitimate need or obligation to prove facts - if this concerns our cooperation;
- 10) other legitimate objectives or obligations related to the Company's business and our cooperation.

## LEGAL BASIS

Your personal data may be processed 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 and/or points (b) and (c) of Article 49(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 for the purposes of the legitimate interests pursued by the controller or by a third party (point (f) of Article 6(1) GDPR) and/or the transfer is necessary for the establishment, exercise or defence of legal claims e.g. when transferring personal data to third countries (point (e) of Article 49(1) GDPR).

Whenever the processing of your data has a legal basis or a legitimate interest, you will be informed about it.

In other cases, you may simply consent to the processing of your personal data for one or more specific purposes (point (a) of Article 6(1) and/or point (a) of Article 49(1) GDPR), which you can revoke at any time.

If the recruitment documents consist the data from Article 9(1) GDPR, your consent is necessary for it processing (point (a) of Article 9(2) GDPR), which can be revoked at any time.

BQ Sp. z o. o. will process your personal data including in subsequent recruitments, if you agree to this (point (a) of Article 6(1) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR), which can be revoked by you at any time.


Legal bases for processing your personal data you can find in The Labour Code of 26th June 1974 (Art. 22 <sup>1a</sup>(1, 2, 5); Art. 22 <sup>1a</sup> (1); Art. 22 <sup>1b</sup> (1), (Journal of Laws 2021, item 1162).and in the Regulation of the Minister of Family, Labour and Social Policy of 10th December 2018 on employee documentation (Journal of Laws of 2018, item 2369).

If we happen to have your data from a third party, you will find out what is the source of your data and what categories of your data we have. We will inform you of this within a reasonable period of time after we obtain them or at our first contact/communication.

## DATA RECIPIENTS

The recipient of your personal data except BQ Sp. z o. o. may also be: Controller's employees, having appropriate authorization to process personal data - data circulation inside the Company or external accounting and human resources office; persons providing IT services; companies cooperating with BQ Sp. z o. o. ; companies from which the Company obtained e. g. co-financing; courier companies, as well as e. g. public bodies to which the controller will be obliged to provide such data by law, etc. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of the persons, companies and institutions to which your data are transferred (and, if necessary, signing appropriate entrustment agreements).

If you apply to us via the website or through some social networking site, we may need to transfer your data to Companies outside the European Economic Area, we will work with such Companies on the basis of international standards for secure cooperation or by signing standard contractual clauses between us and the company or by adopting binding corporate rules (articles 45 to 47 GDPR). In any other cases you will have the opportunity to agree with it (point (a) of Article 49(1) GDPR).

 <b>BQ SPÓŁKA Z O.O.</b>	<b>ANNEX 003 FOR INSTRUCTION 005</b> <b>INFORMATION CLAUSE FOR JOB APPLICANT</b>		Page: 2 / 2 Rev. 06 Date: 01.09.2021
<b>Prepared by: AK</b>	<b>Checked by: PL</b>	<b>Approved by: TD</b>	

## DATA RETENTION PERIOD

Your data collected by BQ Sp. z o. o. are stored until the end of recruitment process. We will retain your data until you withdraw your consent to the processing of your personal data, including receiving marketing and sales content from us through a specific communication channel, or until you object. You can give a consent to the use of your personal data for future recruitment purposes. In such case your data will be stored for 12 months from the time you give your consent.

At the end of the above mentioned periods, when we will start cooperation with you, your recruitment documents will be attached to the personnel documentation, stored for a statutory period of time and archived in accordance with legal requirements.

If the cooperation between us does not start, your recruitment documents will be destroyed (deleted). Then, in order to reconsider your application, please send the documents again.

If you provide us with any data on the basis of your consent, it will be deleted when your consent is withdrawn.

## 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 that you made available for us;
- 3) erasure of your data that you made available for us;
- 4) restriction of processing concerning the data subject that you made available for us;
- 5) to object to processing of your data that you made available for us;
- 6) to data portability of your data that you made available for us;
- 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 and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR).

The place of making your data available to you (if necessary) will be the office of the Administrator in Szczecin at Dąbska 70 Street, 70-786 Szczecin or other place or form jointly agreed with the Administrator.

Company BQ Sp. z o. o. does not carry out automated decision making, including profiling.

## DATA PROVISION


The provision of your personal data according to the extend supplied in the Article 22<sup>1</sup>(1) of the Labour Code is necessary to participate in the recruitment process. The provision of other data by you is voluntary.

## PROCESSING FOR OTHER PURPOSE THAN COLLECTED

If BQ Sp. from the o. o. will plan to further process your personal data for a purpose other than that for which it was collected, you will be informed before such further processing.

Data Controller BQ Sp. z o.o.



 BQ SPÓŁKA Z O.O.	ANNEX No 016A to Policy BQ Sp. z o. o. concerning the protection of personal data INFORMATION CLAUSE FOR CUSTOMERS, SUPPLIERS AND CONTRACTORS	Page: 1 / 2 Rev. 02 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

#### Legal Basis:

- The act of 23 April 1964 Civil Code (Journal of Laws of 2021, item 1509).
- Act of 17 November 1964 - Code of Civil Procedure (Journal of Laws 2021, item 1666).
- 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 - GDPR).
- Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2019, item 1781).

## PERSONAL DATA CONTROLLER

The controller of your personal data is BQ Sp. z o.o. with our registered office at Dąbska 70, 70-786 Szczecin. There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally (by calling the telephone number: +48 693418280), or send your correspondence to the above-mentioned registered office 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](http://www.bq-electric.com) in the "Privacy policy" tab.

## PROCESSING PURPOSES

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

- 1) to satisfy your needs (as e. g. The customer, supplier, contractor) and our mutual obligations;
- 2) to fulfill the conditions set out in the contract signed between us;
- 3) for the Company's administrative purposes in the exercise of our legitimate interest - if this is relevant to our business;
- 4) to consider requests made by you (or on your behalf) and the payment of benefits and liabilities - if it concerns you;
- 5) providing services and orders (including complaints), if it concerns you;
- 6) keeping our HR, accounting and IT records;
- 7) using our website, if it concerns you;
- 8) providing information in connection with the use of social networking sites, if it concerns you;
- 9) providing you with information about our services, offers, orders, if applicable;
- 10) undertaking marketing activities, if you agree;
- 11) maintaining electronically contact (e. g. by e-mail, by phone - according to the form provided, if it concerns you);
- 12) for archival and evidentiary purposes which pursue a legitimate interest in preserving information in the event of a legitimate need or obligation to prove facts - if this concerns our cooperation;
- 13) for the possible establishment, investigation or defense against claims - if this concerns our cooperation;
- 14) for analytical and statistical purposes (e. g. to better match services to your needs, product development, optimisation of service processes, gathering cross-cutting knowledge, financial analysis, etc. ) - if it concerns you;
- 15) to study customer satisfaction - if applicable;
- 16) other legally justified objectives or obligations related to the Company's business and our cooperation.

## LEGAL BASIS

Your personal data may be processed 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 and/or points (b) and (c) of Article 49(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) and/or the transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case (point (g) of Article 49(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 and/or point (f) of Article 49(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 and/or point (d) of Article 49(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) and/or the transfer is necessary for the establishment, exercise or defence of legal claims e.g. when transferring personal data to third countries (point (e) of Article 49(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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR) which you have the right to withdraw your consent at any time.



 BQ SPÓŁKA Z O.O.	ANNEX No 016A to Policy BQ Sp. z o. o. concerning the protection of personal data INFORMATION CLAUSE FOR CUSTOMERS, SUPPLIERS AND CONTRACTORS		Page: 2 / 2 Rev. 02 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD	

## DATA RECIPIENTS

The recipient of your personal data except BQ Sp. z o. o. may also be: Controller's employees, having appropriate authorization to process personal data - data circulation inside the Company or external accounting and human resources office; persons providing IT services; companies cooperating with BQ Sp. z o. o.; companies from which the Company obtained e. g. co-financing; courier companies, as well as e. g. public bodies to which the controller will be obliged to provide such data by law, etc. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of the persons, companies and institutions to which your data are transferred (and, if necessary, signing appropriate entrustment agreements).

If there is a need for your data to be transferred to the Companies cooperating with the Company, located in other countries, within the European Economic Area, whose law provides an equivalent level of protection of personal data in Poland, you will be informed about it and given the opportunity to express your consent.

If there is a need to transfer your data to Companies outside the European Economic Area, we will work with such Companies on the basis of international standards for secure cooperation, such as Privacy Shield, or by signing standard contractual clauses between us and the company or by adopting binding corporate rules (articles 45 to 47 GDPR). In any other cases you will have the opportunity to agree with it (point (a) of Article 49(1) GDPR).

## DATA RETENTION PERIOD

Your data collected by BQ Sp. z o. o. are stored until such time 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 storage period for contracts or data related to the execution of orders is different - determined by the Controller; and different for situations imposed by the legislator) or until your consent is withdrawn.

## 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 that you made available for us;
- 3) erasure of your data that you made available for us;
- 4) restriction of processing concerning the data subject that you made available for us;
- 5) to object to processing of your data that you made available for us;
- 6) to data portability of your data that you made available for us;
- 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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR).

The place of making your data available to you (if necessary) will be the office of the Controller in Szczecin at Dąbska 70 Street, 70-786 Szczecin or other place or form jointly agreed with the Controller.

Company BQ Sp. z o. o. does not carry out automated decision making, including profiling.


## DATA PROVISION

The provision of personal data by you may prove to be a statutory or contractual requirement or a condition for concluding a contract, in which case your failure to provide data may prevent, hinder or significantly limit the scope of cooperation in a given area. It can also be just mandatory. The data you provide by giving your consent is voluntary, although it may also be necessary.

## PROCESSING FOR OTHER PURPOSE THAN COLLECTED

If BQ Sp. from the o. o. will plan to further process your personal data for a purpose other than that for which it was collected, you will be informed before such further processing.

Data Controller BQ Sp. z o.o.

 BQ SPÓŁKA Z O.O.	ANNEX No 016B to Policy BQ Sp. z o. o. concerning the protection of personal data INFORMATION CLAUSE FOR MARKETING ACTIVITIES	Page: 1 / 2 Rev. 02 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

#### **Legal basis:**

- Electronically Supplied Services Act of 18 July 2002 (Journal of Laws of 2020, item 344.).
- The law on telecommunications 2004 (Journal of Laws of 2021, item 576).
- 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 - GDPR).
- Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2019, item 1781).

## **PERSONAL DATA CONTROLLER**

The Controller of your personal data is BQ Sp. z o.o. with our registered office at Dąbska 70 Street, 70-786 Szczecin. There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally (by calling the telephone number: +48 693418280), or send your correspondence to the above-mentioned registered office address or email address: [td@bq-electric.com](mailto:td@bq-electric.com). You can also find more information about the protection of personal data on our website [www.bq-electric.com](http://www.bq-electric.com) in the "Privacy policy" tab.

## **PROCESSING PURPOSES**

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

- 1) to undertake marketing activities - if you agree to this;
- 2) to maintain electronic contact (e. g. by e-mail, telephone) - with your consent;
- 3) providing you with information about our services, offers, orders;
- 4) using our website - if applicable;
- 5) providing information in connection with the use of social networking sites - if applicable;
- 6) considering requests made by you (or on your behalf) - if applicable;
- 7) for archival and evidentiary purposes in the exercise of a legitimate interest in securing information in the event of a legitimate need or obligation to prove facts - if applicable to our cooperation;
- 8) for analytical and statistical purposes (e. g. to better match services to your needs, product development, optimisation of service processes, collection of cross-cutting customer knowledge, financial analysis, etc. ) - if applicable to you;
- 9) to research customer satisfaction - if applicable to you;
- 10) other legally justified objectives or obligations related to the Company's operations and our cooperation.

## **LEGAL BASIS**

Your personal data may be processed when it 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) and/or the transfer is necessary for the establishment, exercise or defence of legal claims e.g. when transferring personal data to third countries (point (e) of Article 49(1) GDPR).

It could include e.g. to provide you with information about our Company and our services, offers, orders, improving our products and services, checking your satisfaction with our products and services.

In other cases, you may simply consent to the processing of your personal data for one or more specific purposes (Article 2(1)(b) of the Charter of Fundamental Rights of the European Union, (point (a) of Article 6(1) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR) which you have the right to withdraw at any time.


If we happen to have your data from a third party, you will find out what is the source of your data and what categories of your data we have. We will inform you of this within a reasonable period of time after we obtain them or at our first contact/communication.

## **DATA RECIPIENTS**

The recipient of your personal data except BQ Sp. z o. o. may also be: Controller's employees, having appropriate authorization to process personal data - data circulation inside the Company or external accounting and human resources office; persons providing IT services; companies cooperating with BQ Sp. z o. o. ; companies from which the Company obtained e. g. co-financing; courier companies, as well as e. g. public bodies to which the controller will be obliged to provide such data by law, etc. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of the persons, companies and institutions to which your data are transferred (and, if necessary, signing appropriate entrustment agreements).

If there is a need for your data to be transferred to the Companies cooperating with the Company, located in other countries, within the European Economic Area, whose law provides an equivalent level of protection of personal data in Poland, you will be informed about it and given the opportunity to express your consent.

If there is a need to transfer your data to Companies outside the European Economic Area, we will work with such Companies on the basis of international standards for secure cooperation or by signing standard contractual clauses between us and the company or by adopting binding corporate rules (articles 45 to 47 GDPR). In any other cases you will have the opportunity to agree with it (point (a) of Article 49(1) GDPR).

 <b>BQ SPÓŁKA Z O.O.</b>	<b>ANNEX No 016B to Policy BQ Sp. z o. o. concerning the protection of personal data INFORMATION CLAUSE FOR MARKETING ACTIVITIES</b>	Page: 2 / 2 Rev. 02 Date: 01.09.2021
<b>Prepared by: AK</b>	<b>Checked by: PL</b>	<b>Approved by: TD</b>

## DATA RETENTION PERIOD

We will retain your data until you withdraw your consent to the processing of your personal data, including receiving marketing and sales content from us through a specific communication channel, or until you object.

Personal data processed in connection with the handling of your request/inquiry will be kept for the time necessary to clarify your case and provide you with a comprehensive response, or for the time necessary to defend and protect your claim.

## YOUR RIGHTS

You have the right to:

- 1) request from the controller access to your data and to receive copy of them;
- 2) rectification of your data that you made available for us;
- 3) erasure of your data that you made available for us;
- 4) restriction of processing concerning the data subject that you made available for us;
- 5) object to processing of your data that you made available for us;
- 6) data portability of your data that you made available for us;
- 7) lodge a complaint with a supervisory authority (address in Poland: Urząd Ochrony Danych Osobowych, Stawki 2, 00-193 Warsaw);
- 8) 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 and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR).

The place of making your data available to you (if necessary) will be the office of the Controller in Szczecin at Dąbska 70 Street, 70-786 Szczecin or other place or form jointly agreed with the Controller.

Company BQ Sp. z o. o. does not carry out automated decision making, including profiling.


## DATA PROVISION

The data provided by you by giving your consent is voluntary. Failure to do so may result in you not being able to contact us or provide you with information about our products and services. It may also prevent, hinder or significantly reduce the scope of cooperation between us.

## PROCESSING FOR OTHER PURPOSE THAN COLLECTED

If BQ Sp. from the o. o. will plan to further process your personal data for a purpose other than that for which it was collected, you will be informed before such further processing.

Data Controller BQ Sp. z o.o.

 BQ SPÓŁKA Z O.O.	ANNEX No 016C to Policy BQ Sp. z o. o. concerning the protection of personal data  INFORMATION CLAUSE - WEBSITE	Page: 1 / 2 Rev. 02 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

#### **Legal basis:**

- Electronically Supplied Services Act of 18 July 2002 (Journal of Laws of 2020, item 344.).
- The law on telecommunications 2004 (Journal of Laws of 2021, item 576).
- 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 - GDPR).
- Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2019, item 1781).

## **PERSONAL DATA CONTROLLER**

The controller of your personal data is BQ Sp. z o.o. with our registered office at Dąbska 70 Street, 70-786 Szczecin. There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally (by calling the telephone number: +48 693418280), or send your correspondence to the above-mentioned registered office address or email address: [td@bq-electric.com](mailto:td@bq-electric.com). You can also find more information about the protection of personal data on our website [www.bq-electric.com](http://www.bq-electric.com) in the "Privacy policy" tab.

## **PROCESSING PURPOSES**

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

- 1) to use our website;
- 2) to provide you with information in connection with the use of other websites - social networking plug-ins, maps;
- 3) to provide you with information about our services, offers, orders;
- 4) to provide you with information about the Company, its employees and co-workers;
- 5) to satisfy your needs and our mutual obligations;
- 6) to keep IT records;
- 7) to carry out the recruitment process - if it concerns you;
- 8) for the Company's administrative purposes - if applicable to our co-operation;
- 9) to process applications submitted by you (or on your behalf) - if it concerns you;
- 10) to carry out services and orders submitted by you (including complaints) - if it concerns you;
- 11) undertaking marketing activities - if you agree;
- 12) maintaining electronic contact (e. g. by e-mail, telephone) - with your consent/on your request;
- 13) for archival and evidentiary purposes, which are the realization of a legitimate interest in securing information in case of a legitimate need or obligation to prove facts - if it concerns our cooperation;
- 14) for analytical and statistical purposes (e. g. in order to better select services to your needs, product development, optimization of service processes, gathering cross-sectional knowledge about customers) - if it concerns you;
- 15) other legitimate objectives or obligations related to the Company's business and our cooperation.

## **LEGAL BASIS**

Your personal data may be processed 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 and/or points (b) and (c) of Article 49(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) and/or the transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case (point (g) of Article 49(1) GDPR);
- 3) 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) and/or the transfer is necessary for the establishment, exercise or defence of legal claims e.g. when transferring personal data to third countries (point (e) of Article 49(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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR) which you have the right to withdraw your consent at any time.

## **DATA RECIPIENTS**

The recipient of your personal data except BQ Sp. z o. o. may also be: Controller's employees, having appropriate authorization to process personal data - data circulation inside the Company or external accounting and human resources office; persons providing IT services; companies cooperating with BQ Sp. z o. o. ; companies from which the Company obtained e. g. co-financing; courier companies, as well as e. g. public bodies to which the controller will be obliged to provide such data by law, etc. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of the persons, companies and institutions to which your data are transferred (and, if necessary, signing appropriate entrustment agreements).

 <b>BQ SPÓŁKA Z O.O.</b>	<b>ANNEX No 016C to Policy BQ Sp. z o. o. concerning the protection of personal data</b>  <b>INFORMATION CLAUSE - WEBSITE</b>	Page: 2 / 2 Rev. 02 Date: 01.09.2021
<b>Prepared by: AK</b>	<b>Checked by: PL</b>	<b>Approved by: TD</b>

If there is a need for your data to be transferred to the Companies cooperating with the Company, located in other countries, within the European Economic Area, whose law provides an equivalent level of protection of personal data in Poland, you will be informed about it and given the opportunity to express your consent.

If there is a need to transfer your data to Companies outside the European Economic Area, we will work with such Companies on the basis of international standards for secure cooperation or by signing standard contractual clauses between us and the company or by adopting binding corporate rules (articles 45 to 47 GDPR). In any other cases you will have the opportunity to agree with it (point (a) of Article 49(1) GDPR).

## DATA RETENTION PERIOD

Your data collected by BQ Sp. z o. o. are stored until such time 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 (the period of data storage determined by the Controller for a given processing may be different; and the period of data storage imposed by the legislator in relation to the fulfilment of a legal obligation may be different) or until the withdrawal of consent.

## 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 that you made available for us;
- 3) erasure of your data that you made available for us;
- 4) restriction of processing concerning the data subject that you made available for us;
- 5) to object to processing of your data that you made available for us;
- 6) to data portability of your data that you made available for us;
- 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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR).

The place of making your data available to you (if necessary) will be the office of the Controller in Szczecin at Dąbska 70 Street, 70-786 Szczecin or other place or form jointly agreed with the Controller.

Company BQ Sp. z o. o. does not carry out automated decision making, including profiling.


## DATA PROVISION

The data provided by you by giving your consent is voluntary. Failure to do so may result in you not being able to contact us or provide you with information about our products and services. It may also prevent, hinder or significantly reduce the scope of cooperation between us.

## PROCESSING FOR OTHER PURPOSE THAN COLLECTED

If BQ Sp. from the o. o. will plan to further process your personal data for a purpose other than that for which it was collected, you will be informed before such further processing.

Data Controller BQ Sp. z o.o.

 BQ SPÓŁKA Z O.O.	ANNEX No 016D to Policy BQ Sp. z o. o. concerning the protection of personal data  INFORMATION CLAUSE - SOCIAL NETWORKING SITES	Page: 1 / 2 Rev. 02 Date: 01.09.2021
Prepared by: AK	Checked by: PL	Approved by: TD

#### Legal basis:

- 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 - GDPR).
- Personal Data Protection Act of 10 May 2018 (Journal of Laws of 2019, item 1781).

## PERSONAL DATA CONTROLLER

The Controller of your personal data is BQ Sp. z o.o. with our registered office at Dąbska 70 Street, 70-786 Szczecin. There is no data protection officer appointed in our Company but if you have any questions, please contact the controller personally (by calling the telephone number: +48 693418280), or send your correspondence to the above-mentioned registered office 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](http://www.bq-electric.com) in the "Privacy policy" tab.

## PROCESSING PURPOSES

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

- 1) to provide/receive information in connection with the use of social networks (e. g. information that you provide to us personally; that we obtain with your consent; that you make available on the portal as public, to which we may have direct access; information that you mark, for example as "Like" or "Subscribe"; links to our Company's website that you use, recommend or make available, etc; as a result of subscribing to our website; following our fanpage; by publishing a comment on our website on the portal; sending messages through portals);
- 2) meeting your needs and our mutual obligations;
- 3) keeping our IT documentation;
- 4) using our website - if you enter it or are redirected to it from a social networking site;
- 5) carrying out the recruitment process - if it concerns you;
- 6) for the Company's administrative purposes which are in our legitimate interest, if it concerns you;
- 7) to consider applications made by you (or on your behalf) - if it concerns you;
- 8) to provide you with information about our services, offers, orders - if it concerns you;
- 9) undertaking marketing activities, if you agree;
- 10) maintaining electronic contact (e. g. by e-mail, by phone)- if you agree;
- 11) for archival and evidentiary purposes that pursue a legitimate interest in securing information in the case of a legitimate need or obligation to prove facts - if this concerns our cooperation;
- 12) in order to possibly establish, investigate or defend against claims - if it concerns you;
- 13) for analytical and statistical purposes (e. g. to better match services to your needs, to develop products, to optimise service processes, to accumulate cross-cutting knowledge, etc. ) - if it concerns you;
- 14) to examine your satisfaction - if it concerns you;
- 15) other legitimate objectives or obligations related to the Company's business and our cooperation.

## LEGAL BASIS

Your personal data may be processed when it 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) and/or the transfer is necessary for the establishment, exercise or defence of legal claims e.g. when transferring personal data to third countries (point (e) of Article 49(1) GDPR).


It could include e.g. to provide you with information about our Company and our services, offers, orders, improving our products and services, checking your satisfaction with our products and services.

In other cases, you may simply consent to the processing of your personal data for one or more specific purposes (point (a) of Article 6(1) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR) which you have the right to withdraw your consent at any time.

If we happen to have your data from a third party, you will find out what is the source of your data and what categories of your data we have. We will inform you of this within a reasonable period of time after we obtain them or at our first contact/communication.

## DATA RECIPIENTS

The recipient of your personal data except BQ Sp. z o. o. may also be: Controller's employees, having appropriate authorization to process personal data - data circulation inside the Company or external accounting and human resources office; persons providing IT services; companies cooperating with BQ Sp. z o. o. ; companies from which the Company obtained e. g. co-financing; courier companies, as well as e. g. public bodies to which the controller will be obliged to provide such data by law, etc. Each time the transfer of such data is preceded by checking the necessity of such action and the reliability of the persons, companies and institutions to which your data are transferred (and, if necessary, signing appropriate entrustment agreements).

 <b>BQ SPÓŁKA Z O.O.</b>	<b>ANNEX No 016D to Policy BQ Sp. z o. o. concerning the protection of personal data</b>  <b>INFORMATION CLAUSE - SOCIAL NETWORKING SITES</b>	Page: 2 / 2 Rev. 02 Date: 01.09.2021
<b>Prepared by: AK</b>	<b>Checked by: PL</b>	<b>Approved by: TD</b>

If there is a need for your data to be transferred to the Companies cooperating with the Company, located in other countries, within the European Economic Area, whose law provides an equivalent level of protection of personal data in Poland, you will be informed about it and given the opportunity to express your consent.

If there is a need to transfer your data to Companies outside the European Economic Area, we will work with such Companies on the basis of international standards for secure cooperation or by signing standard contractual clauses between us and the company or by adopting binding corporate rules (articles 45 to 47 GDPR). In any other cases you will have the opportunity to agree with it (point (a) of Article 49(1) GDPR).

## DATA RETENTION PERIOD

We will retain your data until you withdraw your consent to the processing of your personal data, including receiving marketing and sales content from us through a specific communication channel, or until you object.

Personal data processed in connection with the handling of your request/inquiry will be kept for the time necessary to clarify your case and provide you with a comprehensive response, or for the time necessary to defend and protect your claim.

## 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 that you made available for us;
- 3) erasure of your data that you made available for us;
- 4) restriction of processing concerning the data subject that you made available for us;
- 5) to object to processing of your data that you made available for us;
- 6) to data portability of your data that you made available for us;
- 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) and/or point (a) of Article 9(2) and/or point (a) of Article 49(1) GDPR).

The place of making your data available to you (if necessary) will be the office of the Controller in Szczecin at Dąbska 70 Street, 70-786 Szczecin or other place or form jointly agreed with the Controller.

Company BQ Sp. z o. o. does not carry out automated decision making, including profiling.

## DATA PROVISION

The data provided by you by giving your consent is voluntary. Failure to do so may result in you not being able to contact us or provide you with information about our products and services. It may also prevent, hinder or significantly reduce the scope of cooperation between us.

## PROCESSING FOR OTHER PURPOSE THAN COLLECTED

If BQ Sp. from the o. o. will plan to further process your personal data for a purpose other than that for which it was collected, you will be informed before such further processing.

Data Controller BQ Sp. z o.o.