



## **FRONERI POLSKA Sp. z o.o. - Privacy Policy (25.05.2018)**

### **Introduction**

Welcome to Froneri Polska Sp. z o.o. ("Froneri Polska") privacy notice. Froneri Polska is part of the Froneri Group of companies. You can find out more about our Group of companies on [www.froneri.com](http://www.froneri.com).

Froneri respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when interacting with us including when you visit our website and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Froneri Polska collects and processes your personal data when you interact with us including any data you may provide through this website in particular when you purchase a product or service, take part in a competition, make a complaint, give us your opinion concerning our products, make general or purchase enquiries or provide us – in any other form – your personal data through the website, especially with the use of "Contact" section.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Controller**

Froneri Polska Sp. z o.o. is the controller and responsible for your personal data (collectively referred to as ["COMPANY"], "we", "us" or "our" in this privacy notice). You can contact us using the contact details below.

#### **Contact details**

Our full details are:

**Full name of legal entity:** Froneri Polska Sp. z o.o.

**Email address:** [contact@pl.froneri.com](mailto:contact@pl.froneri.com)

**Postal address:** ul. Wojska Polskiego 3, 39-300 Mielec, Polska.

You have the right to make a complaint at any time to the President of the Data Protection Office (called "Prezes Urzędu Ochrony Danych Osobowych", further: PUODO), the Polish supervisory authority for data



protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the PUODO, so please contact us in the first instance using the Contact section: <https://froneri.ee/kontakt-et/uurimine/>

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 25.05.2018 and historic versions can be obtained by contacting us with the use of our contact form: <https://froneri.ee/kontakt-et/uurimine/>

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, using our contact form at <https://froneri.ee/kontakt-et/uurimine/>

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name last name, username
- **Contact Data** includes – depending on what kind of and quantity of data you would provide us with – e-mail address, telephone number, delivery address.
- **Financial Data** includes bank account or payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. In case you make a purchase enquiry, provision of your data is a condition of taking steps upon your request before conclusion of the agreement – we will not be able to send you an offer without your personal data. In other cases, e.g. when you make a compliant or other enquiry, using our “Contact” section, we will ask you for consent to process your personal data – provision of your data is going to be neither statutory nor contractual condition, however it is likely to be necessary to consider your compliant, get your opinion on products or answer to your enquiries.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website (in case such a possibility is going to be available in the future);
  - become a customer, supplier or enter into other business relationships with us;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - make a compliant;
  - make an enquiry or information connected with work at Froneri Polska through our Contact form;
  - enter a competition, promotion or survey; or
  - give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. For further information on cookies please, see [www.allaboutcookies.org](http://www.allaboutcookies.org)
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers [such as Google based outside the EU];
- Identity and Contact Data from publicly available sources [such as Central Registry and Information about Business Activity or National Court Register

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You will find out more about the types of lawful basis that we will rely on to process your personal data, reading the table below.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. Remember, that you will receive messages containing trade information or other contents of marketing nature through e-mails or SMS-messages under the condition that we receive not only your consent to process your personal data, but also your consent to send you trade information (required by the Act on provision of services by electronic means) and the consent to use terminal equipment and automated calling systems for the purposes of direct marketing (required by the telecommunication law). You have the right to withdraw consent to marketing at any time by contacting us, using our contact form <https://froneri.ee/kontakt-et/uurimine/>

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal

ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(a) To register you as a new customer</p> <p>(b) to answer your purchase enquiries.</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Performance of a contract with you or taking steps upon your request before conclusion of the contract – art. 6 item 1 point b) of GDPR.</p>
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you – art. 6 item 1 point b) of GDPR.</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us) – art. 6 item 1 point f) of GDPR.</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) enabling you to make complaints or taking steps in order to improve our products, services and relationships with customers;</p> <p>(d) responding to your general enquiries.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you – art. 6 item 1 point b) of GDPR.</p> <p>(b) Necessary to comply with a legal obligation – art. 6 item 1 point c) of GDPR.</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) – art. 6 item 1 point f) of GDPR.</p> <p>(d) consent to process your personal data – art. 6 item 1 point a) of GDPR.</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) your consent to process your personal data – art. 6 item 1 point a) of GDPR.</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) – art. 6 item 1 point f) of GDPR.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent</p>

<p>maintenance, support, reporting and hosting of data)</p>		<p>fraud and in the context of a business reorganisation or group restructuring exercise) – art. 6 item 1 point f) of GDPR.</p> <p>(b) Necessary to comply with a legal obligation – art. 6 item 1 point c) of GDPR.</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Your consent to process your personal data – art. 6 item 1 point a) of GDPR.</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) – art. 6 item 1 point f) of GDPR.</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>your consent to process your personal data – art. 6 item 1 point a) of GDPR.</p>

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You are entitled to withdraw all the consents concerning direct marketing, as well as to



make enquiries or complaints concerning direct marketing towards you, using our contact form: <https://froneri.ee/kontakt-et/uurimine/>

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or gave us your consent to receive trade information or to use of terminal equipment and automated calling systems for the purposes of direct marketing.

### **Opting out**

You can ask us to stop sending you marketing messages at any time, using our contact form: <https://froneri.ee/kontakt-et/uurimine/>

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies, please see [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using our contact form <https://froneri.ee/kontakt-et/uurimine/>

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the [*Glossary* at the end of this Policy].

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a

change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International personal data transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator, i.e. in Poland - President of the Data Protection Office (called "Prezes Urzędu Ochrony Danych Osobowych") of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those



purposes through other means, and the applicable legal requirements. In general, depending on the basis to process personal data, the data might be stored:

- a) till withdrawal of consent to process personal data;
- b) till you object to processing of personal data (in case we are obliged to obey to your object);
- c) as long as we are obliged to store personal data in order to fulfil obligations imposed upon us;
- d) till the moment the limitation period of claims of or against the Controller expires;

always taking into consideration the longer term.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You are entitled to:

- Request access to your personal data
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data
- Right to withdraw consent.

You will find more information on your rights in the further parts of this Policy.

If you wish to exercise any of the rights set out above, please contact us using our contact form: <https://froneri.ee/kontakt-et/uurimine/> or per e-mail: [contact@pl.froneri.com](mailto:contact@pl.froneri.com)

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to

ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using our contact form <https://froneri.ee/kontakt-et/uurimine/>

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **External Third Parties**

- Service providers [acting as processors] based in Poland who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in Poland who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based [in Poland, who require reporting of processing activities in certain circumstances.

### **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In case you objected to processing of your personal data for the purposes of direct marketing, your personal data cannot be used for such purposes.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### **USE OF PERSONAL DATA TO PROFILING OR AUTOMATED DECISION MAKING**

Your personal data are not going to be used for the purposes of profiling nor of automated decision making.

This Privacy Policy of Froneri Polska Sp. z o.o. comes into the force on 25<sup>th</sup> of May, 2018.