

## Privacy policy

### Who is the controller of my personal data?

The controller of your personal data is:

**SEFAR spółka z ograniczoną odpowiedzialnością seated in Poznań**

ul. Garbary 56, 61-758 Poznań

VAT no. NIP: 7781471961, statistical no. REGON: 301449649,

entered into the Register of Entrepreneurs of the National Court Register kept by the District Court Poznań-Nowe Miasto i Wilda, VIII Commercial Division of the National Court Register (KRS) under the number: KRS 0000357294,

**The controller is responsible for the use of your personal data in a secure manner compliant with the binding legal regulations.**

### Whom can I contact in matters related with the processing of my personal data?

In all matters related to the processing of your personal data by the controller, please contact:

**e-mail:** biuro.pl@sefar.com,

**tel.:** +48 61 855 16 45,

**by mail:** SEFAR sp. z o.o. ul. Garbary 56, 61-758 Poznań.

The Controller has not assigned an Inspector of Personal Data Protection or its representative.

### What is the source of my data – how are they collected?

We collect personal data directly from you. We obtain your data for various purposes, and process them in various scopes and under different legal bases provided for in GDPR<sup>1</sup>. The periods of personal data processing are also different. To provide you with the most transparent information we have grouped them in relation to the purpose of processing. They are presented below. The Controller does not use personal data for the purpose of automated decision making, including profiling.

### Operating the current business in the scope of sales of filtration products

**Description** The basic business activity of SEFAR sp. z o.o. is the trade in filtration products. Therefore, we process personal data of our business partners' representatives (or business partners themselves) who are interested in purchasing products included in the commercial offer of SEFAR sp. z o.o. in relation with ongoing negotiations, and conclusion and implementation of sales contracts.

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<sup>1</sup> 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) – legal act governing the principles of protecting personal data of natural persons.

**Scope of data** We process personal data of our business partners' representatives, including first name, surname, function/position, information about the company with which this representative is employed, company e-mail address, company telephone number, company address for correspondence. For a business partner who is a self-employed natural person, we process first name, surname, name of business, VAT no. NIP, statistical no. REGON and address.

**Legal basis** Personal data are processed under art. 6 clause 1 letter b of GDPR, i.e. in connection with entering into a sales contract or due performance of the already concluded sales contract. Additionally, personal data are processed under art. 6 clause 1 letter f of GDPR – processing is necessary for the purposes of the legitimate interest pursued by the controller (the legitimate interest of the controller consists in the transfer of personal data within the SEFAR Capital Group in respect of a uniform system of sales management). We also process personal data under art. 6 clause 1 letter c of GDPR – processing is necessary for compliance with a legal obligation to which the controller is subject (e.g. the obligation to issue a VAT invoice).

**Personal data storage period** Personal data of our business partners' representatives will be stored over the period of business relationship, but not exceeding 3 years as of the last contact between the controller and the business partner's representative (or the business partner himself or herself).

#### **Customer service – examining applications, inquiries, claims and complaints**

**Description** The controller processes personal data for the purpose of ongoing customer service, including replying to inquiries or applications, examining complaints, and handling reported claims. The controller also processes personal data to build a positive relation between the controller and business partners who act by their representatives.

**Scope of data** We process the following personal data provided by you in relation with your application, inquiry, claim or complaint: first name, surname, function/position, information about the company with which the individual is employed, company e-mail address, company telephone number, company address for correspondence (if the business partner is an organizational unit). For a business partner who is a self-employed natural person, the controller processes first name, surname, name of business, VAT no. NIP, statistical no. REGON and business address. Additionally, other data are processed that are included in the application, inquiry, claim or complaint, e.g. information about the product, transaction, and data contained in the attached documents. In certain cases the aforementioned data (specifically in connection with other information) may be personal data.

**Legal basis** Personal data are processed for the purpose of fulfilling a legal obligation by the controller (resulting from the generally binding legal regulations or a concluded contract) in relation to the examining of a complaint (art. 6 clause 1 letter c of GDPR). Moreover, the basis of personal data processing is a legitimate interest of the controller, i.e.: building positive relations between the controller and customer based on reliability and loyalty, and tailoring the offer according to the needs of the buyers. Personal data are also processed in connection with a legitimate interest of the controller who processes data within the framework of SEFAR Capital Group in relation with a uniform system of sales management.

**Storage period** The controller processes personal data for a period necessary to provide a reply to an inquiry, claim or application, but not exceeding 3 months as of submission. In case of examining complaints, personal data are processed over the period necessary to consider them, but not exceeding 2 years.

### **Using bookkeeping, accounting, payroll and human resources services**

**Description** Personal data are processed for the purpose of keeping books, VAT registers, preparing monthly and annual tax returns, providing reports to the statistical office, and preparing financial statements.

**Scope of data** We are obligated under the binding legal regulations to store VAT invoices, bills and other accounting documents, and therefore, to process personal data contained therein (including first name, surname, address, business name, VAT no. NIP, statistical no. REGON) for accounting and bookkeeping purposes.

**Legal basis** Personal data are processed under art. 6 clause 1 letter c of GDPR – processing is necessary for compliance with a legal obligation to which the controller is subject.

**Personal data processing period** Personal data are processed by the controller for the storage period of accounting, bookkeeping, tax and payroll documentation. Personal data contained in VAT invoices are processed for the prescribed invoice storage period, i.e. for 5 years as of the end of the calendar year in which the period for the payment of VAT due to a VAT invoice expired.

### **Ascertaining, pursuing and enforcing claims**

**Description** Personal data are processed for the purpose of protecting the civil rights of the controller, i.e. to ascertain a claim, including its scope and circumstances, to take steps leading to a compulsory or voluntary satisfaction of the claim. Data are also processed for the purpose of the controller's defense against third party claims.

**Scope of data** The controller processes certain personal data necessary to ascertain, pursue and enforce claims, e.g. first name, surname, information on the transaction, other information needed to prove the claim, including the size of damage.

**Legal basis** Personal data processing is based on art. 6 section 1 letter f of GDPR – legitimate interest of the controller consisting in ascertaining, pursuing and enforcing claims, and defense against claims in proceedings before courts and other state authorities.

**Personal data processing period** The controller processes personal data until the expiration of claims. The basic period of limitation for claims resulting from business activity amounts to 3 years as of the claim maturity date, and 3 years as of the date the eligible person became aware of the damage and the person obliged to mitigate it; however, the period of limitation may be prolonged in certain circumstances. In particular, the controller may process personal data for a longer time over the period of court or enforcement proceedings.

### **Using IT services**

**Description** Your personal data are processed mainly for the purpose of providing IT supervision services, remove defects and failures of the IT network. Your personal data are also processed in the course of hardware and software maintenance procedures, supervision and administration of IT network, online services, databases, data backup, IT network security control, installation of system software and applications on computers, provision of consulting services, including participation in computer hardware and software purchases, user support in the scope of system software and applications, hardware and peripheral equipment, removal of malfunctions in software and hardware.

**Scope of data** We process personal data of our business partners' representatives, including first name, surname, function/position, information about the company with which the individual is employed, company e-mail address, company telephone number, company address for correspondence. For a business partner who is a self-employed natural person, we process first name, surname, name of business, VAT no. NIP, statistical no. REGON and business address.

**Legal basis** Personal data processing for the purpose of providing IT services is based on the legitimate interest of the controller consisting in ensuring proper IT services to the enterprise (art. 6 section 1 letter f of GDPR).

**Personal data processing period** Personal data are processed over the storage period resulting from the basic purpose of data processing (e.g. in relation with examining complaints, the controller processes personal data for the period necessary to provide a reply to the complaint, but not exceeding 2 years).

#### **Purchase of goods and third party services – running the current business activity**

Data are processed for the purpose of: running business activity in the scope of filtration products, including the establishment and maintenance of trade relations with suppliers and service providers, entering into and performing other trade contracts related to the business activity, meeting legal obligations of the controller (e.g. to issue a VAT invoice), ascertaining, defending and pursuing claims.

**Scope of data** We process personal data of corporate representatives (e.g. employees, directors, etc.), including first name, surname, function/position (and information about the company with which the individual is employed), company address for correspondence, company e-mail address and company telephone number. For a business partner who is a self-employed natural person, we process first name, surname, name of business, VAT no. NIP, statistical no. REGON and address.

**Legal basis** Personal data are processed under art. 6 clause 1 letter b of GDPR, i.e. in connection with steps taken prior to a contract conclusion or its performance. Additionally, personal data are processed under art. 6 clause 1 letter f of GDPR – processing is necessary for the purposes of the legitimate interests pursued by the controller (the legitimate interests of the controller consists in the transfer of personal data within the SEFAR Capital Group in respect of a uniform system of sales management). We also process personal data under art. 6 clause 1 letter c of GDPR – processing is necessary for compliance with a legal obligation to which the controller is subject (e.g. the obligation to issue a VAT invoice).

**Personal data storage period** Personal data will be stored over the period of business relationship, but not exceeding 3 years as of the last contact between the controller and the business partner's representative (or the business partner himself or herself).

#### **To whom are my personal data transferred?**

Personal data controller cares for the confidentiality of your personal data with utmost diligence. Due to the necessity to meet contractual requirements and ensure business continuity by the controller, personal data are transferred to the entities listed below.

### **Service providers, including IT service providers**

We transfer your personal data to the providers of services we use to operate our business. The deliveries provide the controller with technical and organizational solutions, and make it possible to provide services to users and to manage the organization. We also transfer data to our IT service providers, including the suppliers of servers on which personal data are stored.

### **SEFAR Capital Group**

We transfer your personal data to the SEFAR Capital Group entities. This results from the Group's uniform system of filtration products sales management.

### **Controller service**

We may transfer your data to legal and consulting service providers, and advisors supporting the controller in pursuing justified claims (specifically legal firms), and to companies providing the controller with audit services.

### **State authorities**

We make your personal data available at the request of competent state authorities, in particular the Prosecutor's Office, the Police, the President of the Personal Data Protection Office (UODO), the President of the Office of Competition and Consumer Protection (UOKiK), or the President of the Office of Electronic Communications (UKE).

### **Are my data transferred outside the European Union or the European Economic Area?**

Certain subcontractors of the controller have their seats in the countries outside the European Economic Area. A transfer can be made to a country recognized by the European Commission as capable of ensuring a level of protection adequate to the one in the European Union.

### **Am I obliged to provide my personal data?**

The provision of certain personal data is necessary for the collaboration between you and the controller. The provision of other personal data is voluntary and not necessary for the collaboration between you and the controller. We will inform you each time about the data you have to provide and about those you may provide on a voluntary basis.

### **What rights do I have?**

In respect of processing your personal data the controller ensures the exercise of your related rights that are listed below. You can exercise your rights by sending requests to:

- a) e-mail: [biuro.pl@sefar.com](mailto:biuro.pl@sefar.com),
- b) tel.: +48 61 855 16 45,
- c) by mail: SEFAR sp. z o.o. ul. Garbary 56, 61-758 Poznań.

### **In relation to the processing of your personal data you have the right to:**

- 1) withdraw consent to personal data processing, without affecting the lawfulness of processing based on consent before its withdrawal,
- 2) object to the use of data,
- 3) demand erasure of data (“the right to be forgotten”),
- 4) demand limitation of data processing,
- 5) access the data,
- 6) rectify the data,
- 7) transfer the data to another controller.

### **How soon can we fulfill your demands?**

If, upon exercising the aforementioned rights, you send us a request, we can fulfill or reject it promptly, but not later than within a month as of receipt. However, if we are unable to meet your request within a month due to its complexity, we will do so within the next two months and notify you in advance about the intended prolongation.

### **Right to lodge a complaint**

If personal data processing infringes legal regulations, you may lodge a complaint with a supervisory authority by the agency of the personal data controller. Complaints may be lodged with the President of the Personal Data Protection Office (UODO).

### **Short version (e.g. in e-mail footers or as needed)**

**The Controller of your personal data is: SEFAR sp. z o.o. seated in Poznań** (ul. Garbary 56, 61-758 Poznań, KRS: 0000357294).

**Personal data are processed for the purpose of:** (1) operating the current business in the scope of sales of filtration products by SEFAR sp. z o.o.; (2) customer service – examining applications, inquiries, claims and complaints; (3) using bookkeeping, accounting, payroll and human resources services; (4) ascertaining, pursuing and enforcing claims; (5) using IT services; (6) purchasing of goods and using third party services for the purpose of operating the current business. **Personal data may be transferred to:** service providers, including IT service providers, companies of the SEFAR Capital Group, entities providing services to the controller, subcontractors, state authorities. Upon transferring data outside the EU and EEA, the controller transfers data to a country ensuring proper protection of personal data, compliant with the European Commission decision.

**The person whose data is processed, is entitled to:** 1) withdraw consent to process data, 2) object to the use of data, 3) demand erasure of data (“the right to be forgotten”), 4) demand limitation of data processing, access to data, 5) rectify data, 6) transfer data, 7) lodge a complaint. **Detailed information on personal data processing principles are included in the Privacy Policy** <https://www.sefar.com/en/573/Witaj-w-Sefar-Sp-z-o-o.htm?Article=2614195>