

Information on the processing of personal data

Information on the processing of personal data by Euler Hermes Collections sp. z o. o. (further referred to as the "Controller"), for:

- customers,
 - counterparties,
 - natural persons conducting economic activities whose data are processed within the framework of an economic operator database run by the Controller,
- and employees and representatives of afore-mentioned entities.

Euler Hermes Collections sp. z o.o. as the data Controller processes the data of economic operators – natural persons conducting economic activities and the related data on employees and collaborators of these entities as well as the data concerning employees, associates and representatives of legal entities, in particular, as regards the data disclosed and collected from publicly available registers, such as, for example: CEiDG (Central Registration and Information on Business Activities), KRS (National Court Register), GUS (Central Statistical Office), Monitor Sądowy i Gospodarczy (Court and Commercial Gazette) and other public data sources. The additional data sources concerning the conducted economic activities can be your Business Partners, Counterparties or data Controller's Customers which can submit the additional data to us. At the request of your present and prospective Business Partners we can contact you in order to collect additional financial data. In this situation the data are collected directly from you on the basis of your voluntary consent which can be withdrawn by you at any time. For contact purposes with your company we can collect your contact data from publicly available sources, in particular, from your website.

1. Controller of personal data

The controller of personal data is **Euler Hermes Collections sp. z o.o.** seated in Warsaw at Al. Jerozolimskie 98; 00-807 Warsaw (the "Controller").

The Controller can be contacted by post at the address of the seat or by mail: iodo@eulerhermes.com.

2. Data protection officer

The Data Protection Officer was designated at the Controller. This is a person who can be contacted in all issues which relate to the processing of personal data and to the enjoyment of the rights linked with the processing of personal data. The Data Protection Officer can be contacted as follows:

- by post at the address: Inspektor Ochrony Danych Euler Hermes Collections sp. z o.o., Al. Jerozolimskie 98; 00-807 Warszawa,
- via e-mail: iodo@eulerhermes.com.

3. Purposes of the processing of personal data and legal basis for the processing of the data

3.1. If you are a Customer

We will process the personal data for:

- concluding a contract and implementing its terms and conditions. The legal basis for the processing of the data is the necessity for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- fulfilling obligations resulting from generally applicable regulations, in particular, from accounting rules and in connection with payment of taxes, including conducting and holding fiscal books and documents linked with conducting fiscal books and holding accounting evidence. The legal basis for the processing of the data are legal obligations resulting from tax regulations (e.g. General Tax Code, Law on VAT, Corporate Income Tax Law) and rules on accounting (Accounting Law).
- potentially handling submitted notifications and complaints. The legal basis for the processing of the data is the performance of the contract, in case of a request submitted by the Controller's customer, or a legitimate interest of the Controller consisting in handling notifications and complaints.

Euler Hermes Collections sp. z o.o.
 Al. Jerozolimskie 98
 00-807 Warszawa
 tel. +48 22 385 47 77
 fax +48 22 385 48 92
 infolinia: +48 22 233 4444
eulerhermes.pl

- potentially conducting direct marketing of our products and services, including profiling in order to determine preferences and needs as regards our products and to present a proper offer based on profiling and to carry out an analysis concerning sale and use of our services. The legal basis for the processing of the data is a legitimate interest of the Controller consisting in the possibility of conducting direct marketing of its services, presenting information on our products and services to customers and increasing sale or in case of entities not being the Controller's customers - appropriate legitimate interest of the Controller or voluntary consent.
- potentially performing customer satisfaction surveys - the legal basis for the processing of the data is a legitimate interest of the Controller consisting in maintaining standards as regards offered products and services;
- defending against potential claims or pursuing potential claims linked with a contract – if a dispute related to a contract arises. The legal basis for the processing of the data is our legitimate interest consisting in the possibility of defending against claims or pursuing claims;
- potentially implementing the rights of the data subject, in accordance with provisions of Article 12-22 GDPR. The legal basis for the processing of the data is a legitimate interest of the Controller consisting in implementing notified requests and ensuring accountability foreseen in the provisions of the general data protection regulation,
- potentially taking actions linked with preventing money laundering and terrorist financing, the legal basis for the processing of the data is a legitimate interest of the Controller consisting in implemented group processes aiming at preventing money laundering and terrorist financing;
- potentially fulfilling obligations linked with FATCA/CRS reporting – the legal basis for the processing of the data is a legitimate interest of the Controller consisting in implemented group processes aiming at FATCA/CRS reporting;
- potentially verifying entities on sanction lists - the legal basis for the processing of the data is a legitimate interest of the Controller consisting in implemented group processes aiming at verifying entities on sanction lists and minimising a reputational risk.

3.2.If you are a natural person conducting economic activities whose data are processed within the framework of an economic operator database run by the Controller

We will process the personal data for:

- examining economic operators' payment credibility, assessing the risk of trade transactions, developing and making available trade information on companies to your Business Partners, Counterparties or Euler Hermes' Customers in order to secure business transactions and to establish by these entities possible cooperation with you, in particular, through the processing of register data on conducted economic activities or performed functions in publicly available registers, in particular, such as the Central Registration and Information on Business Activities (CEiDG), National Court Register (KRS) or Central Statistical Office (GUS) and optionally the data concerning the financial situation of your company when they are voluntarily disclosed by you - The legal basis for the processing of the data is a legitimate interest of the Controller or the third party (your Business Partners,

Sąd rejestrowy: Sąd Rejonowy dla m.st. Warszawy w Warszawie, XII Wydział Gospodarczy Krajowego Rejestru Sądowego, Nr KRS: 0000044623; NIP: 527-21-77-123
 Wysokość kapitału zakładowego: 18 946 000,00 zł
 Siedziba: Warszawa

Counterparties or Euler Hermes' Customers) consisting in building a database on companies by the Controller, ensuring security of business transactions and establishing by these entities cooperation with you. The legal basis for the processing of the data concerning the financial situation of your company is consent,

- potentially conducting direct marketing of our products and services, including profiling in order to determine preferences and needs as regards our products and to present a proper offer based on profiling and to carry out an analysis concerning sale and use of our services. The legal basis for the processing of the data is a legitimate interest of the Controller consisting in the possibility of conducting direct marketing of its services, presenting information on our products and services to customers and increasing sale, or in case of entities not being the Controller's customers - appropriate legitimate interest of the Controller or voluntary consent,
- defending against potential claims or pursuing potential claims linked with a contract – if a dispute related to a contract arises. The legal basis for the processing of the data is our legitimate interest consisting in the possibility of defending against claims or pursuing claims;
- potentially implementing the rights of the data subject, in accordance with provisions of Article 12-22 GDPR. The legal basis for the processing of the data is a legitimate interest of the Controller consisting in implementing notified requests and ensuring accountability foreseen in the provisions of the general data protection regulation.

3.3. If you are a counterparty

We will process the personal data for:

- concluding a contract and implementing its terms and conditions. The legal basis for the processing of the data is the necessity for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- fulfilling obligations resulting from generally applicable regulations, in particular, from accounting rules and in connection with payment of taxes, including conducting and holding fiscal books and documents linked with conducting fiscal books and holding accounting evidence. The legal basis for the processing of the data are legal obligations resulting from tax regulations (e.g. General Tax Code, Law on VAT, Corporate Income Tax Law) and rules on accounting (Accounting Law).
- defending against potential claims or pursuing potential claims linked with a contract – if a dispute related to a contract arises. The legal basis for the processing of the data is our legitimate interest consisting in the possibility of defending against claims or pursuing claims;
- potentially implementing the rights of the data subject, in accordance with provisions of Article 12-22 GDPR. The legal basis for the processing of the data is a legitimate interest of the Controller consisting in implementing notified requests and ensuring accountability foreseen in the provisions of the general data protection regulation.

3.4. If you are an employee of entities indicated in Points 3.1. – 3.3.

We will process the personal data for:

- implementing a contract connecting the Controller with an entity of which you are an employee/collaborator/representative, in particular, in order to confirm circumstances indicated in documents handed over by these entities in connection with the performance of this contract. The legal basis for the processing of the data is our legitimate interest consisting in the possibility of performing the afore-mentioned contract,
- potentially implementing the rights of the data subject, in accordance with provisions of Article 12-22 GDPR. The legal basis for the processing of the data is a legitimate interest of the Controller consisting in implementing notified requests

and ensuring accountability foreseen in the provisions of the general data protection regulation.

4. Processed data categories

In connection with the conclusion and performance of the contract we can process accordingly the following personal data: identification data (such as name and surname, name of conducted economic activities, registration numbers, in particular, tax identification number), contact data (including address of registered office, e-mail address, telephone number, fax number, employer's business name, occupational position or performed function), contact data (including address of registered office, e-mail address, telephone number, fax number, employer's business name), financial data, data on concluded contracts and presented offers (including financial terms and conditions and financial data linked with the contract, date of contract conclusion),

As regards the economic operator data base run by the Controller, the Controller processes the publicly available data and additional data, in particular, identification and contact data to the economic operator and alternatively financial data in case when they are submitted to the data Controller by your Business Partners, Counterparties or data Controller's Customers as well as the data concerning the rating, payment morality index (PMI) and recommended cooperation.

5. Sources of data and their scope

- external sources: including publicly available registers, such as, in particular, CEIDG (Central Registration and Information on Business Activities), KRS (National Court Register), GUS (Central Statistical Office) and other as regards the publicly available data; the data submitted by your Business Partners, Counterparties or data Controller's Customers; publicly available databases, including your websites.
- other sources: data collected directly from you on the basis of your consent; data submitted by entities in which you are employed or of which you are representatives – to the extent necessary to perform the contract.

In case of collecting the personal data of employees of entities indicated in Points 3.1. – 3.3., the scope of collected data includes only professional data, in particular, such as: professional contact data, occupational position, performed function.

6. Information on automated decision-making and profiling

The data on the economic operators, processed by the Controller, in particular, the data collected from the data collected from publicly available registers are subject to analysis and forecast, i.e. profiling, as regards the economic operator's economic situation and payment credibility, both by automatic means and with human involvement, the result of which is obtained so-called rating, economic operator's payment morality index (PMI) and recommendation concerning cooperation with an economic operator.

7. Storage period of personal data

We will process the personal data during the performance of the contract concluded with you or a company which you represent/in which you work/with which you cooperate as well as for a period of limitation to claim as regards this contract. We will store the personal data included in the tax or accounting documentation until the expiry of the data storage obligations resulting from tax regulations and rules on accounting.

In case of the data processed on the basis of consent, in particular, as regards the data collected directly from you concerning the financial statements, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In case of the data of the economic operators processed within the framework of the contracts concluded with the Controller, and not being party to the contract, collected from publicly available registers or other sources, described above in detail, these data shall be processed until you submit a reasoned objection to the processing of the data to the data Controller.

8. Recipients of personal data and transmission of data to third countries

We will transmit the personal data to:

- the Companies belonging to the Euler Hermes Group, including the companies established in Poland, i.e.: Towarzystwo Ubezpieczeń Euler Hermes S.A. seated in Warsaw and Euler Hermes, Okurowska-Minkiewicz, Maliszewski – Kancelaria Prawna spółka komandytowa seated in Warsaw and,
- authorised agents, agencies of research analyses, experts, consultants and specialist in communication management and events involving Euler Hermes, our supplier to which we will outsource the services linked with the processing of personal data, e.g. IT service providers, accounting, tax, advisory, audit or other service providers. Such entities process the data on the basis of a contract concluded with us and only in accordance with our instructions.
- your Business Partners, Counterparties or data Controller's Customers, interested in undertaking economic cooperation with you;
- courier or mail service suppliers,

The Controller of your data belongs to the Allianz Capital Group which runs activities with global outreach. Depending on the nature of offered products and services your personal data in justified cases can be transmitted to the entities established outside the European Economic Area. If the data are transmitted outside the European Economic Area (EEA) then we apply the rules on protection of personal data defined in the Euler Hermes Policy on Standards for the Protection of Privacy the integral part of which constitute the Allianz Group Binding Corporate Rules which constitute adequate safeguards concerning the transmission of the personal data. You have the right to obtain copies of adequate safeguards concerning the transmission of the personal data – to obtain them you should contact the Controller or the Data Protection Officer (contact data in Points 1 and 2 above).

9. Rights linked with the processing of personal data

You have the following rights linked with the processing of personal data:

- a. the right of access to personal data concerning you,
- b. the right to rectification of personal data concerning you,
- c. the right to erasure of personal data concerning you,
- d. the right to restriction of processing of personal data concerning you,
- e. if the processing is based on consent or the necessity for the performance of a contract to which the data subject is party and the processing is carried out by automated means - the right to data portability, i.e. the right to receive from us the personal data concerning you, in a structured, commonly used and machine-readable format. You have the right to transmit those data to another data controller or to request us to transmit the data to another controller. However, we will transmit those data to another data controller only where it is technically feasible.
- f. the right to object, on grounds relating to your particular situation, to processing of personal data concerning you – in case when we process your data on the basis of our legitimate interest performed by the Controller or the third party (our Business Partners cooperating with you) pursuant to Article 6(1)(f) GDPR.
- g. the right to object to processing of personal data concerning you for direct marketing purposes;
- h. the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- i. the right to lodge a complaint with a supervisory authority dealing with the protection of personal data, i.e. the President of the Personal Data Protection Office (Warsaw, Stawki 2),

In order to exercise the afore-mentioned rights indicated in Points a-g contact the Controller or the Data Protection Officer (contact data in Points 1 and 2 above)

10. Obligation to submit data

Data submission is voluntary but necessary to conclude and perform a contract or provide services by the Controller. Without

data submission it will be not possible to conclude the contract and undertake cooperation with Euler Hermes Collections sp. z o. o. The submission of the data concerning the financial situation of your company for examining payment credibility is voluntary and the basis of their processing is your consent.