



PRIVACY POLICY OF ENSON LIMITED LIABILITY COMPANY

I. INTRODUCTION

In our organization, we take care of your personal data. Therefore, we want to provide you with the most important information regarding its processing, storage, and why some data are essential to maintain a high standard of services. As a responsible organization aware of the value of information and its need for proper protection, we are committed to adequately informing you about matters related to the processing of personal data, especially in light of the provisions on the protection of personal data, including the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR).

The information contained in this Policy aims to present what happens to your data while using our website and key information about the legal bases for processing personal data, methods of collection and use, and the rights of data subjects related to this. In processing personal data, we adhere to the following guidelines, fulfilling at least one condition for the processing of personal data.

II. WHEN DOES THIS POLICY APPLY?

This privacy policy applies to all cases where ENSON Ltd. (the "Company") is the data controller and processes personal data. This includes both cases where we process personal data obtained directly from the person concerned, as well as cases where we have obtained personal data from other sources. The Company fulfills its information obligations in both of the above cases, as specified in Articles 13 and 14 of the GDPR. Below we present the full details of the company:

ENSON Limited Liability Company

N. Barlickiego 2

97-200 Tomaszów Mazowiecki

KRS 846378

REGON 386315322

NIP 7732493141

III. CONTACT

For any questions related to the processing of personal data, please contact us via email at info@enson.pl or in writing to our headquarters.

IV. PRINCIPLES OF PROCESSING PERSONAL DATA

In our activities, we strive to maintain transparency regarding the manner and legal basis of personal data processing, as well as the purposes for which we process personal data. As the Data Controller, we ensure that whenever we process personal data based on a legally justified interest of the data controller, we try to analyze and balance our interest and the potential impact on the person concerned, as well as their rights. We do not process personal data in situations where the impact on the person concerned would outweigh our interest.

Principles of processing personal data:

We process personal data lawfully, fairly, and transparently.

Personal data is collected for specific, explicit, and legitimate purposes and is not further processed in a manner incompatible with those purposes.

Personal data is collected only to the extent necessary for the purposes.

Personal data is kept up to date as needed.

Personal data is stored in a form allowing identification of the data subject for no longer than necessary for the purposes for which the data is processed.

Personal data is processed in a way that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical and organizational measures.

Legal basis for processing personal data:

When collecting personal data, we always inform about the legal basis for their processing, which arises from the provisions of the GDPR. When we inform about:

Art. 6(1)(a) GDPR – it means we process personal data based on obtained consent.

Art. 6(1)(b) GDPR – it means we process personal data because they are necessary for the performance of a contract or to take actions prior to entering into a contract, upon request.

Art. 6(1)(c) GDPR – it means we process personal data to fulfill a legal obligation.

Art. 6(1)(f) GDPR – it means we process personal data to perform legally justified interests.

Your personal data will not be processed in an automated manner, including profiling.

The period of storage of your personal data depends on the purpose for which the data is processed.

The period for which your personal data will be stored is dependent on:

Legal provisions that may oblige the Company to store data for a specified time.

The period necessary to protect the interests of the data controller.

The time for which consent has been given.

Recipients of your data may include:

IT service providers,

Couriers,

Delivery companies,

Security firms,

Entities authorized to receive Personal Data under legal provisions.

Your personal data will not be transferred to a third country or an international organization.

You have the right to:

Access the content of your personal data.

Rectify (correct, supplement) your data.

Limit the processing of your data or delete it.

Transfer personal data you have provided to us, i.e., receive your personal data in a structured, commonly used, machine-readable format, and you have the right to transmit this data to another controller; if technically feasible, you have the right to request that personal data be transferred directly from us to another controller.

Object to further processing of your personal data.

You have the right to withdraw your consent at any time. Withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you have doubts about the correctness of the processing of your personal data by the Company, you have the right to lodge a complaint with the President of the Office for Personal Data Protection.

V. HOW WE SECURE YOUR PERSONAL DATA:

We implement appropriate technical measures in accordance with Article 32 of the GDPR, considering the state of knowledge, implementation costs, and the nature, scope, context, and purposes of processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons, and organizational measures ensuring a level of security appropriate to the risk. The safeguards applied to protect your data are compliant with legal requirements and ensure an adequate level of data confidentiality.

VI. INFORMATION ON PROCESSING DATA FOR THE PURPOSE OF ENTERING INTO AND PERFORMING CONTRACTS, POTENTIAL CLAIMS, AND DEFENSE AGAINST THEM:

We may process personal data necessary for the performance of a contract entered into with you. Even before its conclusion, we may process personal data necessary to take actions at your request. This processing is based on Article 6(1)(b) of the GDPR.

In the case of executing a contract for paid services, we may process data for the fulfillment of accounting and tax obligations. This processing is based on Article 6(1)(c) of the GDPR.

During the execution of the contract and after its completion, we process personal data of the contract party for the potential consideration of claims, as well as their pursuit. Our legally justified interest, for example, might be to respond to a potential complaint, as we are obliged by separate civil law provisions. In this case, we will process personal data based on the legally justified interest of defending against potential claims or pursuing them. This processing is based on Article 6(1)(f) of the GDPR.

We will store this data for the period necessary to achieve the specified purposes, but no longer than the limitation period for claims arising from separate legal provisions.

Providing this data is voluntary, but failure to provide it will prevent the conclusion or execution of the contract.

VII. COOKIES/TOOLS:

The Company's website uses cookies. These are commonly used, small files containing a string of characters that are sent and saved on the end device (e.g., computer, laptop, tablet, smartphone) used while visiting the website. These details are transmitted to the memory of the used browser, which sends them back upon subsequent entries to the website. Cookies can be categorized considering three methods of division:

Regarding the purposes of using cookies, we can distinguish:

- Essential Cookies – These enable the proper functioning of the website and its functionalities, e.g., authentication or security cookies. Without them saved on the device, using the website would be impossible.
- Analytical Cookies – These enable monitoring of visited web pages, sources of traffic, time spent on the website. Without them, the use of website functionalities will not be limited.
- Advertising Cookies – These enable the display of personalized ads on or outside the website. Without them, the use of website functionalities will not be limited.
- Social Media Cookies – These enable the display of the company's fanpage within the website, as well as liking it. Without them, the use of website functionalities will not be limited.

Regarding the validity period, we can distinguish cookies:

- Session cookies – Existing until the end of a particular session.
- Permanent cookies – Existing after the session is completed.

Regarding the distinction of the entity administering cookies, we differentiate:

- Our cookies.
- Third-party cookies.

The provider of cookies, cookie name, purpose of the cookie, type of cookie, and cookie validity period are as follows:

- Polylang, WordPress plugin: pll_language, stores information about the selected language of the page, First-Party Cookies, 1 year.
- GDPR Cookie Compliance, WordPress plugin: moove_gdpr_popup, stores user consent information for third-party cookies (Google Analytics), First-Party Cookies, 6 months.
- Google Analytics: _ga, for collecting information and reporting website usage statistics without personally identifying individual visitors to Google, Third-Party Cookies, 1 year.
- Recaptcha: _grecaptcha, analytics – checks whether the user is human or a bot, 6 months.
- Facebook: _fbp, this file is used to track user actions on websites that use Facebook advertising services. The collected data is anonymous and does not identify specific individuals, 3 months.

Except for essential cookies, their processing is based on the user's consent. Cookie settings can be changed at any time. These settings can be altered, particularly to block the automatic handling of cookies in the internet browser settings or to inform about their placement in the device every time. Detailed information on the possibilities and methods of handling cookies is available in the software settings (internet browser).

Detailed information on the possibilities and methods of handling cookies is available in the software settings, i.e., the internet browser.

- Firefox Browser
- Chrome Browser
- Internet Explorer Browser
- Opera Browser
- Safari Browser

We use cookies administered by Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043, United States, as part of the services:

- Google Analytics – This service uses cookies stored on your computer to analyze how you use the website. Google will use this information to evaluate the use of our website, compile reports on website activity, and provide other services related to website usage. The IP

address transmitted by your browser as part of Google Analytics is not combined with other Google data. You can prevent the transmission to Google and processing by Google of the data generated by the cookie and related to your use of the website; to do this, download and install the browser plugin available at the following address: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

- Google Maps – This service allows us to display interactive maps directly on the website, enabling you to conveniently use the map functions.

More information:

- <https://policies.google.com/privacy>
- https://support.google.com/analytics/answer/9019185?hl=pl&ref_topic=2919631

The Company and Facebook are joint administrators of the data of Users who have liked the Company's fanpage. Therefore, as the administrator of the fanpage, the Company may obtain anonymous statistical data about visitors to the page using features provided by Facebook. These data are collected through cookies, each containing a unique user code (they are active for two years and stored by Facebook on the hard drive of the computer or any other medium of persons visiting the fanpage). The user code, which can be linked to the connection data of users registered on Facebook, is downloaded and processed at the time of opening the fanpage. Although these are anonymous data, the Company may ask Facebook to process them in terms of:

1. Demographic data.
2. Information about lifestyle, interests.
3. Geographic data.

Simultaneously, data of persons who have liked the Company's fanpage may be processed in a non-anonymized form in the case of:

1. Communication through Messenger available on Facebook.
2. Commenting on posts shared on the fanpage.
3. Participation in various promotional activities, contests – in this case, processing will be carried out based on the User's explicit consent, in accordance with the rules contained in

the further action's regulations. In no case will the data of persons who have liked the fanpage be used for any other purpose than that for which they were provided. Their processing will be carried out exclusively on Facebook and in accordance with the general terms of use of the portal.

VIII. CHANGES TO THIS POLICY

We commit to regularly reviewing this Privacy Policy and modifying it when necessary or desirable due to: new legal regulations, new guidelines from bodies responsible for supervising personal data protection processes, and best practices in the area of personal data protection.

We also reserve the right to change this Privacy Policy in the event of changes in technology used for processing personal data (if such change affects the wording of this document), as well as in case of changes in the methods, purposes, or legal bases for processing personal data by us.

This Privacy Policy becomes effective on the date of its publication on the Company's website. Changes to the Privacy Policy occur through the publication of its new content on the Company's website.

Information about the change of the Privacy Policy will be published on our website no later than 3 days before the new version becomes effective.

Information Obligations

CONTRACTORS:

We inform you that:

1. Your personal data will be processed to take actions at the request of the data subject, before concluding a contract, in the case of selecting your offer, for signing and executing the contract based on Article 6(1)(b) of the GDPR, and the legally justified interest pursued by the administrator in connection with the pursuit or defense of claims based on Article 6(1)(f) of the GDPR.
2. Your personal data will not be processed in an automated manner, including profiling.

3. The relevant personal data will be stored for the duration of the contract, as well as after its termination and the time required to establish, pursue, or defend claims.
4. You have the right to request access to your personal data, rectification, deletion, or limitation of processing, the right to object to processing, as well as the right to data portability.
5. Selected data may be shared with the following entities: Business Information Bureau (BIG), law offices, bailiffs, insurance companies, debt collection companies, software providers, entities providing technical support.
6. Providing data is voluntary but necessary for the performance of the contract.
7. You have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

CONTRACTORS' EMPLOYEES:

We inform you that:

1. Personal data will be processed to verify the identity of persons authorized by the Parties to exchange information, make arrangements on behalf of the Parties, and perform other actions indicated in the contract using the provided email addresses, phone numbers of individual employees/co-workers, which results from the legally justified interest pursued by the Administrator and is necessary for the implementation of the contract to which your employer/client is a party; Article 6(1)(f) of the GDPR.
2. Your personal data will not be processed in an automated manner, including profiling.
3. The relevant personal data will be stored for the duration of the contract with your employer, as well as after its termination and the time required to establish, pursue, or defend claims.
4. You have the right to request access to your personal data, rectification, deletion, or limitation of processing, the right to object to processing, as well as the right to data portability.
5. Recipients of your data may include IT service providers and other entities authorized under separate legal provisions.

6. Providing data is voluntary but necessary for the execution of the contract or order.
7. You have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

JOB APPLICANTS:

We inform you that:

1. Your personal data will be processed for the purpose of carrying out the recruitment process.
2. In the case of establishing an employment relationship, the legal basis for processing your data is the legal obligation on the administrator – Article 6(1)(c) of the GDPR and the Labor Code, as well as consent (in the case of providing more data than required by law) – Article 6(1)(a) of the GDPR. For collaborators, interns, and trainees, the legal basis for processing is Article 6(1)(b) of the GDPR - the contract.
3. Your personal data will not be processed in an automated manner, including profiling.
4. Your personal data will be stored until the end of the recruitment process, and in the case of consent to participate in future recruitment processes, until the withdrawal of this consent.
5. Consent to the processing of personal data can be withdrawn at any time electronically at info@enson.pl. Withdrawal of consent does not affect the legality of processing based on consent before its withdrawal.
6. You have the right to request access to your personal data, rectification, deletion, or limitation of processing, and in the case of processing personal data based on consent – the right to data portability.
7. Providing your personal data to the extent required by Article 22¹ of the Labor Code is necessary to participate in the recruitment process. Providing other data is voluntary.
8. You have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

CONTACT

We inform you that:

1. Your personal data will be processed for the purpose of handling correspondence based on Article 6(1)(f) of the GDPR.
2. Your personal data will not be processed in an automated manner, including profiling.
3. Your personal data included in the form or letter will be stored for the period necessary to perform the tasks resulting from the content of the correspondence, while personal data necessary for the registration of correspondence will be stored for a period of 5 years from the end of the calendar year in which acceptance and entry into the correspondence book occurred.
4. Recipients of data may include IT service companies and advisors.
5. You have the right to request access to your personal data, rectification, deletion, or limitation of processing, the right to object to processing, as well as the right to data portability.
6. Providing data is voluntary but necessary to handle the received correspondence.
7. You have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.