

COMPANY PRIVACY POLICY ENSON LIMITED LIABILITY COMPANY

I. INTRODUCTION

At our organization, we care about your personal data, which is why we want to provide you with the most important information related to its processing and storage, and explain why some of it is necessary for us to ensure a high standard of service.

As a responsible organization that is aware that information has a certain value and is a resource that requires proper protection, we are committed to keeping you properly informed about matters related to the processing of personal data, especially in view of the provisions on the protection of personal data, including Regulation (EU) (EU) 2016/679 of 27.04.2016 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 is intended to explain what happens to your data when you use our website and to provide key information about the legal basis for the processing of personal data, the methods of its collection and use, as well as the rights of data subjects in this regard. When processing personal data, we comply with 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 in which ENSON sp. z o.o. ("Company") is the controller of personal data and processes personal data. This applies both to cases in which we process personal data obtained directly from the data subject and to cases in which 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, in accordance with these provisions. Below are the full details of the company:

ENSON Spółka z ograniczoną odpowiedzialnością (limited liability company)

ul. Słoneczna 3A, 97-216 Czerniewice

KRS 0000846378

REGON 386315322

NIP 7732493141

III. CONTACT

If you have any questions regarding the processing of personal data, please contact us by email at info@enson.pl or in writing to our registered office address.

IV. RULES FOR THE PROCESSING OF PERSONAL DATA

In our activities, we want to maintain transparency regarding the manner and legal basis for the processing of personal data, as well as the purposes for which we process personal data.



As the Controller, we assure you that whenever we process personal data on the basis of the legitimate interest of the data controller, we strive to analyze and balance our interest and the potential impact on the data subject and their rights. We do not process personal data in situations where the impact on the data subject would outweigh our interest.

Principles of personal data processing:

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 to achieve the purposes.

Personal data is updated as necessary.

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

Personal data shall be processed in a manner that ensures appropriate security of personal data: protection against unauthorized or unlawful processing and accidental loss, destruction, or damage by appropriate technical and organizational measures.

When collecting personal data, we always inform you about the legal basis for its processing. It results from the provisions of the GDPR. When we inform you about:

Article 6(1)(a) of the GDPR – this means that we process personal data on the basis of the consent received,

Article 6(1)(b) of the GDPR – this means that we process personal data because it is necessary for the performance of a contract or in order to take steps prior to entering into a contract, upon request,

Article 6(1)(c) of the GDPR – this means that we process personal data in order to comply with a legal obligation,

Article 6(1)(f) of the GDPR – this means that we process personal data for the purposes of our legitimate interests.

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

The period for which your personal data will be stored depends on the purpose for which the data is processed. The period for which your personal data will be stored depends on:

- 1) the legal provisions that may oblige the Company to store the data for a specified period of time,
- 2) the period necessary to protect the interests of the data controller,
- 3) the period for which consent has been given.

The recipients of your data may be:

- 1) IT service providers,
- 2) couriers,
- 3) delivery companies,
- 4) security companies



- 5) entities authorized to receive Personal Data on the basis of legal provisions.

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

You have the right to:

- 1) access your personal data,
- 2) rectify (correct, supplement) it,
- 3) restrict their processing or delete them,
- 4) transfer the personal data you have provided to us, i.e. to receive this personal data in a structured, commonly used, machine-readable format, you have the right to send this data to another controller; if technically possible, you have the right to request that we send your personal data directly to another controller,
- 5) object to the further processing of your personal data.

You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing of your data that was carried out on the basis of your consent prior to its withdrawal.

If you have any doubts as to 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 Personal Data Protection Office.

V. HOW WE SECURE YOUR PERSONAL DATA:

We take appropriate technical measures in accordance with Article 32 of the GDPR, taking into account the state of the art, the costs of implementation 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 to ensure a level of protection appropriate to the risk.

The safeguards used to protect your data comply with legal requirements and guarantee an adequate level of data confidentiality.

VI. INFORMATION ON DATA PROCESSING FOR THE PURPOSE OF CONCLUDING AND PERFORMING CONTRACTS, POSSIBLE CLAIMS, AND DEFENSE AGAINST THEM

We may process personal data necessary for the performance of a contract concluded with you. However, even before the conclusion of the contract, we may process personal data necessary to take action at your request. The processing of such data is based on Article 6(1)(b) of the GDPR.

In the case of the performance of a contract for the provision of paid services, we may process data for the purpose of fulfilling accounting and tax obligations. The processing of this data is based on Article 6(1)(c) of the GDPR.

During the performance of the contract and after its completion, we process the personal data of the parties to the contract for the purpose of possible claims and their enforcement. Our legitimate interest is, for example, the ability to respond to any complaints, which we are obliged to do under separate



provisions of civil law. In such a case, we will process personal data on the basis of a legitimate interest, which is to defend against or pursue any claims. The processing of this data 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 until the expiry of the limitation period for claims under separate legal provisions.

Providing this data is voluntary, but failure to provide it will prevent the conclusion or performance 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 stored on the end device (e.g., computer, laptop, tablet, smartphone) used when visiting the website. This information is sent to the memory of the browser used, which sends it back the next time you visit the website. Cookies can be categorized using three methods of classification.

In terms of the purposes for which cookies are used, we can distinguish between:

Essential files – these files enable the website and its functionality to work properly, e.g., authentication or security cookies. Without them being stored on the device, it would be impossible to use the website.

Analytical files – these files enable the monitoring of opened websites, traffic sources, and time spent on the website. Without saving them, the use of the website's functionality will not be limited.

Advertising files – these files enable the display of personalized advertisements within or outside the website. Without saving them, the use of the website's functionality will not be limited.

Social media files – these files enable the display of a fan page on the website, as well as the ability to like it. Without saving them, the use of the website's functionality will not be limited.

In terms of their validity period, we can distinguish between the following types of cookies:

session cookies – existing until the end of a given session,

persistent cookies – existing after the end of the session.

In terms of the entity administering cookies, we distinguish between:

- our cookies,
- third-party cookies.

Cookie provider	Cookie name	Purpose of the cookie	Cookie type	Cookie validity period
PolyLang, WordPress plugin	pll_language	stores information about the selected language of the website	First-Party Cookies	1 year



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

With the exception of essential cookies, their processing is based on the user's consent. You can change your cookie settings at any time. In particular, these settings can be changed to block the automatic handling of cookies in your web browser settings or to inform you each time they are placed on your device. Detailed information about the possibilities and ways of handling cookies is available in the software (web browser) settings.

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

- Firefox browser
- Chrome browser
- Internet Explorer
- Opera browser
- Safari browser



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

Google Analytics – this service uses cookies that are stored on your computer and enable analysis of how the website is used. Google will use this information to evaluate the use of our website, compile reports on website activity, and to provide us with other services related with website usage. The IP address transmitted by your browser as part of Google Analytics is not combined with other Google data.

You can prevent Google from collecting and processing the data generated by cookies and related to your use of the website by downloading and installing the browser plug-in available at the following address: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

Google Maps – a service that allows us to display interactive maps directly on the website, enabling you to conveniently use the map features.

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 controllers of the data of Users who have liked the Company's fan page.

Therefore, as the administrator of the fan page, the Company may obtain anonymous statistical data about visitors to the site using a feature provided by Facebook. This data is collected through cookies, each of which contains a unique user code (they are active for two years and stored by Facebook on the hard drive of the computer or on any other medium of visitors to the fan page). The user code, which can be linked to the connection data of users registered on Facebook, is downloaded and processed when the fan page is opened. Although this data is anonymous, the Company may request Facebook to process it in terms of:

- 1) demographic data;
- 2) information about lifestyle and interests;
- 3) geographic data;

At the same time, the data of people who have liked the Company's fan page may be processed in a non-anonymized form in the case of:

- 1) Communication via Messenger available on Facebook,
- 2) Commenting on posts shared on the fan page,
- 3) Participation in various promotional campaigns and competitions – in this case, processing will be carried out on the basis of the User's explicit consent, in accordance the rules contained in the terms and conditions of the campaign.

Under no circumstances will the data of persons who have liked the fan page be used for any purpose other than that for which it was provided. Their processing will be carried out exclusively on the Facebook portal and in accordance with the general rules of use of the portal.



VIII. CHANGES TO THIS POLICY

We undertake to regularly review this Privacy Policy and amend it when necessary or desirable due to: new legal regulations, new guidelines from authorities responsible for supervising personal data protection processes, best practices in the field of personal data protection.

We also reserve the right to change this Privacy Policy in the event of changes in the technology we use to process personal data (if the change affects the wording of this document), as well as in the event of changes in the methods, purposes, or legal basis for our processing of personal data.

The Privacy Policy shall enter into force on the date of its publication on the Company's website. The Privacy Policy is amended by publishing its new content on the Company's website.

We publish information about changes to the Privacy Policy on our website no later than 3 days before the new wording comes into force.

Information obligations

CONTRACTORS:

Please be advised that:

- 1) Your personal data will be processed for the purpose of taking action at the request of the data subject, prior to the conclusion of a contract, in the event of your offer being selected, for the purpose of signing and performing the contract, including the handling of complaints, pursuant to Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (EU) 2016/679 and the legitimate interest pursued by the controller in connection with the investigation or defense of claims pursuant to Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council
- 2) Your personal data will not be processed in an automated manner, including in the form of profiling.
- 3) The personal data in question will be stored during the term of the contract, as well as after its termination and after the expiry of the period required to establish, pursue or defend claims.
- 4) You have the right to request access to your personal data, its rectification, deletion or restriction of processing, the right to object to processing, and the right to data portability.
- 5) Selected data may be made available to the following entities: Economic Information Bureau (BIG), law firms, bailiffs, insurance companies, debt collection companies, software providers, and technical support providers.
- 6) Providing data is voluntary, but necessary for the performance of the contract.
- 7) Please be advised that you have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.



CONTRACTOR'S EMPLOYEES:

Please be advised that:

- 1) Personal data will be processed for the purpose of verifying the identity of persons authorized by the Parties to exchange information, make arrangements on behalf of the Parties, and perform other activities specified in the contract, including the handling of complaints, using the e-mail addresses provided, telephone numbers of individual employees/associates, which results from the legitimate interest pursued by the Controller and is necessary for the performance of the contract to which your employer/principal is a party; Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council.
- 2) Your personal data will not be processed in an automated manner, including in the form of profiling.
- 3) The personal data in question will be stored during the term of the contract with your employer, as well as after its termination and after the expiry of the period required to establish, pursue, or defend claims.
- 4) You have the right to request access to your personal data, its rectification, erasure or restriction of processing, the right to object to processing, and the right to transfer your data.
- 5) The recipients of your data may be entities providing IT services and other entities authorized under separate legal provisions.
- 6) Providing data is voluntary, but necessary for the performance of a contract or order.
- 7) Please be advised that you have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

JOB APPLICANTS:

Please be advised that:

1. Your personal data will be processed for the purpose of the recruitment process.
2. If an employment relationship is established, the legal basis for the processing of your data is the legal obligation incumbent on the controller – Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council and the Labor Code, as well as consent (in the case of providing more data than is required by law) – Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council. In the case of associates, apprentices, and interns, the legal basis for processing is Article 6(1)(6) of Regulation (EU) 2016/679 of the European Parliament and of the Council – contract.
3. Your personal data will not be processed in an automated manner, including in the form of profiling.
4. Your personal data will be stored until the end of the recruitment process, and if you consent to participate in future recruitment processes, until such consent is withdrawn.
5. Consent to the processing of personal data may be withdrawn at any time by sending an email to info@enson.pl. Withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.
6. You have the right to request access to your personal data, its rectification, deletion or restriction of processing, and in the case of personal data processing based on consent, the right to data portability.



7. Providing your personal data within the scope of 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

Please be advised that:

1. Your personal data will be processed for the purpose of handling correspondence pursuant to Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council.
2. Your personal data will not be processed in an automated manner, including in the form of profiling.
3. Your personal data provided in the form or letter will be stored for the period necessary to perform the tasks resulting from the content of the correspondence, while the personal data necessary for recording the correspondence will be stored for a period of 5 years from the end of the calendar year in which it was received and entered into the correspondence book.
4. The recipients of the data may be IT service providers and consultants.
5. You have the right to request access to your personal data, rectification, erasure or restriction of processing, the right to object to processing, and the right to data portability.
6. Providing data is voluntary, but necessary for handling the correspondence received.
7. Please be advised that you have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

COMMERCIAL OFFER

1. Your personal data will be processed for the purpose of sending marketing information and commercial offers, based on your consent – Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council.
2. Your personal data will not be processed in an automated manner, including in the form of profiling.
3. Your personal data will be stored until your consent is withdrawn.
4. The provision of your personal data is voluntary.
5. Consent to the processing of personal data may be withdrawn at any time by sending an email to: info@enson.pl Withdrawal of consent does not affect the lawfulness with the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.
6. You have the right to request access to your personal data, its rectification, deletion or restriction of processing, and in the case of personal data processing based on consent, the right to data portability.
7. You have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

COMPLAINTS

Please be advised that:



1. Personal data will be processed for the purpose of verifying the identity of persons authorized by the Parties to lodge complaints, using the e-mail addresses provided, the telephone numbers of individual employees/associates, which results from the legitimate interest pursued by the Controller and is necessary for the performance of a contract to which the Controller's contractor is a party, pursuant to Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council.
2. Your personal data will not be processed in an automated manner, including in the form of profiling.
3. The personal data in question will be stored during the term of the contract with your employer, as well as after its termination and after the expiry of the period required to establish, pursue, or defend claims.
4. You have the right to request access to your personal data, its rectification, erasure or restriction of processing, the right to object to processing, and the right to transfer your data.
5. The recipients of your data may be entities providing IT services and other entities authorized under separate legal provisions.
6. Providing data is voluntary, but necessary for the performance of a contract or order.
7. Please be advised that you have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office.

