

# Personal Data Processing Policy in BTC Ltd.

## 1 DEFINITIONS

- 1.1 Administrator - BTC Ltd. with its registered office in Szczecin, building C, II floor, 1 Maja 38 Street, tel. +48 91 433 18 80.
- 1.2 Personal Data - all information about an identified or identifiable natural person through one or more specific factors defining physical, physiological, genetic, mental, economic, cultural, or social identity, including image, voice recording, contact details, location data, information contained in correspondence, information collected through recording equipment or other similar technology.
- 1.3 Policy - this Personal Data Processing Policy.
- 1.4 GDPR - 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.
- 1.5 Data Subject - any natural person whose personal data is processed by the Administrator, e.g., a person visiting the Administrator's premises or sending an inquiry in writing or electronically.

## 2 DATA PROCESSING BY THE ADMINISTRATOR

- 2.1 In connection with its business activities, the Administrator collects and processes personal data in accordance with applicable regulations, in particular with the GDPR and the principles of data processing provided therein.
- 2.2 The Administrator:
  - 2.2.1 ensures transparency of data processing;
  - 2.2.2 always informs about data processing at the time of their collection, in particular about the purpose and legal basis of data processing, unless based on separate regulations the Administrator is not obliged to do so;
  - 2.2.3 ensures that data are collected only to the extent necessary for the specified purpose and processed only for as long as necessary.
- 2.3 By processing data, the Administrator ensures their security and confidentiality and access to information about the processing to the data subjects. If, despite the security measures applied, a personal data breach occurs that could result in a high risk to the rights or freedoms of data subjects, the Administrator will inform the affected persons about the incident in accordance with the regulations.

## 3 CONTACT WITH THE ADMINISTRATOR

- 3.1 Contact with the Administrator is possible via the email address [mkaczynski@btc.com.pl](mailto:mkaczynski@btc.com.pl) or by mail at "Data Protection Officer, BTC Ltd., building C, II floor, 1 Maja 38 Street, 71-627 Szczecin."
- 3.2 The Administrator has appointed a Data Protection Officer, who is Maciej Kaczyński. The Officer can be contacted via email at [iod@btc.com.pl](mailto:iod@btc.com.pl) regarding any matters related to personal data processing.

## **4 PERSONAL DATA SECURITY**

- 4.1 To ensure the integrity and confidentiality of data, the Administrator has implemented procedures allowing access to personal data only to authorized persons and only to the extent necessary for the tasks they perform.
- 4.2 The Administrator applies organizational and technical solutions to ensure that all operations on personal data are recorded and carried out only by authorized persons.
- 4.3 The Administrator takes all necessary actions to ensure that subcontractors and other cooperating entities provide guarantees of applying appropriate security measures whenever they process personal data on behalf of the Administrator.
- 4.4 The Administrator continuously analyzes risks and monitors the adequacy of the applied data security measures to the identified threats. If necessary, the Administrator implements additional measures to enhance data security.
- 4.5 The Administrator respects the obligations arising from the professional secrecy of legal advisors and attorneys, in addition to the obligations arising from the GDPR.

## **5 PURPOSES AND LEGAL BASES FOR PROCESSING EMAIL/TRADITIONAL CORRESPONDENCE**

- 5.1 If contacting the Administrator via email or traditional correspondence unrelated to services provided to the sender or another contract with them, the personal data contained in this correspondence are processed solely for communication and resolving the matter to which the correspondence relates.
- 5.2 The legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) GDPR) in conducting correspondence related to its business activities
- 5.3 The Administrator processes only personal data relevant to the matter addressed in the correspondence. All correspondence is stored in a manner ensuring the security of the personal data (and other information) contained therein and disclosed only to authorized persons.

## **TELEPHONE CONTACT**

- 5.4 If contacting the Administrator by telephone in matters unrelated to a concluded contract or provided services, the Administrator may request personal data only if necessary to handle the matter at hand. The legal basis for this is the legitimate interest of the Administrator (Article 6(1)(f) GDPR) in resolving the reported issue related to its business activities.

## **ACCESS CONTROL**

- 5.5 To ensure the security of people and property, the Administrator controls access to the premises and the areas it manages. The data collected this way are not used for any other purposes.
- 5.6 Data collected in the register of entries and exits are processed to ensure safety and order on the premises and possibly to defend against claims or pursue them. The legal basis for processing personal data is the legitimate interest of the Administrator (Article 6(1)(f) GDPR) in ensuring the security of the Administrator's property and protecting its rights.

## **RECRUITMENT**

- 5.7 In recruitment processes, the Administrator expects the provision of personal data (e.g., in CVs) only to the extent specified in labor law regulations. If a candidate provides other data not required by the Administrator, it is assumed that they consent to their processing, and such consent can be withdrawn at any time without affecting the lawfulness of the processing carried out before its withdrawal. If the submitted applications contain information irrelevant to the recruitment purpose, they will not be used or considered in the recruitment process.
- 5.8 Personal data are processed:
- 5.8.1 to fulfill obligations arising from legal provisions related to the employment process, primarily the Labor Code - the legal basis for processing is the legal obligation of the Administrator (Article 6(1)(c) GDPR in connection with the Labor Code);
  - 5.8.2 to conduct the recruitment process in terms of data not required by law, as well as for future recruitment processes - the legal basis for processing is consent (Article 6(1)(a) GDPR);
  - 5.8.3 to establish or pursue potential claims or defend against such claims - the legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) GDPR).
- 5.9 Where personal data are processed based on consent, it can be withdrawn at any time without affecting the lawfulness of processing carried out before its withdrawal. If consent is given for future recruitment processes, personal data are deleted no later than two years after, unless the consent is withdrawn earlier.

## **COLLECTING DATA IN CONNECTION WITH SERVICE PROVISION OR OTHER CONTRACTS**

- 5.10 When collecting data for purposes related to the performance of a specific contract, the Administrator provides the data subject with detailed information about the processing of their personal data at the time of contract conclusion

## **COLLECTING DATA IN OTHER CASES**

- 5.11 In connection with its business activities, the Administrator also collects personal data in other cases, e.g., during business meetings or by exchanging business cards for the purpose of initiating and maintaining business contacts. The legal basis for processing in such cases is the legitimate interest of the Administrator (Article 6(1)(f) GDPR) in creating a network of contacts related to its business activities.
- 5.12 Personal data collected in such cases are processed solely for the purpose for which they were collected, and the Administrator ensures their appropriate protection.

## **6 DATA RECIPIENTS**

- 6.1 In connection with conducting activities requiring the processing of personal data, personal data may be disclosed to external entities, including in particular suppliers responsible for the maintenance of IT systems and equipment (e.g., CCTV equipment), entities providing accounting services, couriers, marketing, or recruitment agencies.
- 6.2 The Administrator reserves the right to disclose selected information concerning the data subject to competent authorities or third parties who request such information based on an appropriate legal basis and in accordance with applicable law

## **7 TRANSFERRING DATA OUTSIDE THE EEA**

- 7.1 The Administrator does not transfer personal data outside the EEA.

## **8 PERIOD OF PERSONAL DATA PROCESSING**

- 8.1 The period of data processing by the Administrator depends on the type of service provided and the purpose of processing. The processing period may also result from regulations when they form the basis for processing. In the case of data processing based on the legitimate interest of the Administrator, e.g., for security reasons, data are processed for the period enabling the realization of this interest or until an effective objection to data processing is raised. If processing is based on consent, data are processed until it is withdrawn. When the basis for processing is the necessity to conclude and perform a contract, data are processed until its termination.
- 8.2 The processing period may be extended if the processing is necessary to establish or pursue claims or defend against claims, and after this period, only if and to the extent required by law. After the processing period, data are irreversibly deleted or anonymized.

## **9 RIGHTS RELATED TO PERSONAL DATA PROCESSING**

- 9.1 Data subjects have the following rights:
  - 9.1.1 the right to information about personal data processing - on this basis, the Administrator provides the data subject with information about the processing of their data, including the purposes and legal bases of processing, the scope of possessed data, entities to whom the data are disclosed, and the planned date of data deletion;
  - 9.1.2 the right to obtain a copy of the data - on this basis, the Administrator provides a copy of the processed data concerning the data subject;
  - 9.1.3 the right to rectification - the Administrator is obliged to remove any discrepancies or errors concerning the processed personal data and supplement them if they are incomplete;

- 9.1.4 the right to data deletion - on this basis, one can request the deletion of data whose processing is no longer necessary to achieve any of the purposes for which they were collected;
- 9.1.5 the right to limit processing - in case of such a request, the Administrator ceases to perform operations on personal data, except for operations to which the data subject has consented, and their storage, in accordance with accepted retention rules or until the reasons for limiting data processing cease (e.g., a decision of the supervisory authority allowing further data processing is issued);
- 9.1.6 the right to data portability - on this basis, to the extent that data are processed in connection with the concluded contract or based on consent, the Administrator issues the data provided by the data subject in a format allowing for reading the data on a computer. It is also possible to request that the data be sent to another entity, provided there are technical possibilities in this regard both on the part of the Administrator and the specified entity;
- 9.1.7 the right to object to data processing for marketing purposes - the data subject may at any time object to the processing of personal data for marketing purposes, without needing to justify such an objection;
- 9.1.8 the right to object to other purposes of data processing - the data subject may at any time object, on grounds relating to their particular situation, to the processing of personal data carried out based on the legitimate interest of the Administrator (e.g., for analytical or statistical purposes or for reasons related to property protection). An objection in this respect should include justification;
- 9.1.9 the right to withdraw consent - if data are processed based on consent, the data subject has the right to withdraw it at any time, which does not affect the lawfulness of the processing carried out before the withdrawal of consent;
- 9.1.10 the right to lodge a complaint - if the data subject considers that the processing of personal data violates the provisions of the GDPR or other provisions regarding the protection of personal data, they can lodge a complaint with the President of the Personal Data Protection Office.

## **MAKING DEMANDS RELATED TO THE EXERCISE OF RIGHTS**

- 9.2 A request regarding the exercise of data subject rights can be submitted
  - 9.2.1 in writing to the address: BTC Ltd., Building C, 2nd floor, 1 Maja 38 St., 71-627 Szczecin.
  - 9.2.2 by e-mail to: [iod@btc.com.pl](mailto:iod@btc.com.pl).
- 9.3 If the Administrator cannot identify the person submitting the request based on the application, they will request additional information from the applicant.
- 9.4 The request may be submitted in person or through an attorney. For reasons of data security, the Administrator encourages the use of a power of attorney in a form certified by a notary public or authorized legal counsel or attorney, which will significantly speed up the verification of the authenticity of the application.
- 9.5 The request should be answered within one month of receipt. If it is necessary to extend this period, the Administrator shall inform the applicant of the reasons for the delay
- 9.6 The response is provided by traditional mail, unless the request is made by e-mail or an electronic response is requested.

## **10 CHANGES TO THE PERSONAL DATA PROCESSING POLICY**

- 10.1 The Policy is reviewed on an ongoing basis and updated as necessary.
- 10.2 The current version of the Policy is in force from 28 April 2023.