



ORLEN TECHNOLOGIE

RULES OF PERSONAL DATA PROCESSING IN ORLEN TECHNOLOGIE S.A.

I. DEFINITIONS

1. **Administrator** - ORLEN TECHNOLOGIE S.A. with its seat in Krosno, 38-400 Krosno, Naftowa 8 Street, entered in the register of entrepreneurs under KRS number: 0000422566, NIP number: 527-23-51-360. Contact telephone number for ORLEN TECHNOLOGIE S.A.: 13 43 625 11.
2. **Personal data/data** - any information about a natural person identified or identifiable by one or more specific factors determining physical, physiological, genetic, mental, economic, cultural or social identity, including image, voice recording, contact data, location data, information contained in correspondence, information collected through recording equipment or other similar technology.
3. **RODO** - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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.
4. **Data Subject** - an individual to whom personal data processed by the Administrator relates, such as a person using the Administrator's services, providing services to the Administrator, or directing an inquiry to the Administrator in written traditional or electronic form.

II. DATA PROCESSING BY THE ADMINISTRATOR

1. In connection with its business activities, the Administrator shall collect and process personal data in accordance with the regulations on personal data protection, including in particular the provisions of the RODO and the rules provided therein.
2. The Administrator:
 - 2.1. shall ensure transparency in the processing of personal data;



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- 2.2. informs about the processing of data, in particular about the purpose and legal basis of personal data processing, unless it is not obliged to do so under separate regulations;
- 2.3. ensures that data are collected only to the extent necessary for the indicated purpose and are processed only for the period of time necessary;
- 2.4. ensures the security and confidentiality of the data and access to information about the processing to Data Subjects.

III. CONTACT WITH THE CONTROLLER

1. Contact with the Administrator is possible via e-mail address: iodo@technologie.pgnig.pl or correspondence address: ORLEN TECHNOLOGIE S.A., 8 Naftowa Street, 38-400 Krosno. It is also possible to contact the Administrator by telephone at the telephone number indicated in item. 1.1.
2. The Administrator has appointed a Personal Data Protection Officer who can be contacted via email address: iodo@technologie.pgnig.pl on any matter concerning the processing of personal data or in writing to the address: ORLEN TECHNOLOGIE S.A., 8 Naftowa Street, 38-400 Krosno with the note "Data Protection".

IV. SECURITY OF PERSONAL DATA

1. In order to ensure the integrity and confidentiality of data, the Administrator has implemented procedures that allow access to personal data only to authorized persons and only to the extent that it is necessary due to the tasks performed by them. The Administrator uses organizational and technical solutions to ensure that all operations on personal data are recorded and performed only by authorized persons.
2. The Administrator shall take all necessary measures to ensure that also its subcontractors and other cooperating entities provide a guarantee of the application of appropriate security measures whenever they process personal data on behalf of the Administrator.



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3. The Administrator shall conduct a risk analysis on an ongoing basis and monitor the adequacy of the personal data security measures applied to the identified risks. If necessary, the Administrator shall implement additional measures to enhance security.

V. PURPOSES AND LEGAL BASIS OF PROCESSING

CORRESPONDENCE (E-MAIL, TRADITIONAL)

1. When addressing the Administrator via e-mail or traditional correspondence unrelated to the contract concluded with the sender or the services provided, the personal data contained in this correspondence are processed solely for the purpose of communication and resolution of the matter to which the correspondence relates.
2. The legal basis for the processing of personal data is the legitimate interest of the Administrator (Article 6(1)(f) of the RODO), consisting of correspondence addressed to him in connection with his business activities.
3. The Administrator processes only personal data relevant to the matter to which the correspondence relates.

All correspondence is stored in a manner that ensures the security of the personal data contained therein (and other information) and is disclosed only to authorized persons.

TELEPHONE CONTACT

4. When contacting the Administrator by telephone, on matters unrelated to the concluded contract or services provided, the Administrator may request personal data only if it is necessary to handle the matter to which the contact relates. The legal basis in such a case is the legitimate interest of the Administrator (Article 6(1)(f) of the RODO) consisting of the necessity to resolve the reported matter related to its business activity.

PROCESSING OF DATA IN CONNECTION WITH THE PROVISION OF SERVICES OR PERFORMANCE OF OTHER CONTRACTS.



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5. In the case of collection of data for purposes related to the conclusion or performance of a specific contract, the Administrator shall provide the data subject with details of the processing of his/her personal data at the time of conclusion of the contract or at the time of acquisition of the personal data in case the processing is necessary for the Administrator to take action at the request of the Data Subject prior to the conclusion of the contract.

The scope of the transferred data is in any case limited to the extent necessary for the aforementioned purposes. The legal basis in such a case is the necessity to perform a contract to which the Data Subject is a party, or to take action at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) RODO).

PROCESSING OF DATA IN CONNECTION WITH THE PROVISION OF SERVICES RELATED TO THE USE OF PROGRAMS/APPLICATIONS OFFERED BY THE CONTROLLER.

6. In the case of collection of data for purposes related to the use of programs/applications offered by the Administrator, the Administrator shall provide the data subject with detailed information regarding the processing of his/her personal data when he/she joins the program/application, this information can be found in the regulations dedicated to the specific program and/or application. The scope of the transferred data is in any case limited to the extent necessary for the aforementioned purposes. The legal basis in such a case is the necessity to perform a contract to which the data subject is a party, or to take action at the request of the data subject prior to entering into a contract (Article 6(1)(b) RODO).

PROCESSING OF PERSONAL DATA OF MEMBERS OF BODIES, PROXIES, ATTORNEYS, OR PERSONNEL OF CONTRACTORS OR CLIENTS COOPERATING WITH THE CONTROLLER

7. In connection with the conclusion of contracts in the course of its business, the Administrator obtains from contractors / clients data of members of bodies, proxies or



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attorneys, persons involved in the execution of such contracts (e.g. persons authorized to contact, executing orders, etc.). The scope of the data provided is in each case limited to the extent necessary to confirm their powers of representation and performance of the contract, and usually does not include information other than name and business contact details.

8. Such personal data shall be processed for the purpose of realizing the legitimate interests of the Administrator and its contractor (Article 6(1)(f) of the RODO) in enabling the proper and effective performance of the contract. Such data may be disclosed to third parties involved in the performance of the contract.
9. Data shall be processed for the period of time necessary for the realization of the above interests and the performance of regulatory obligations.

COLLECTION OF DATA IN THE FRAMEWORK OF BUSINESS CONTACTS

10. In connection with its operations, the Administrator also collects personal data in other cases - such as during business meetings - for the purposes of initiating and maintaining business contacts. The legal basis for processing in this case is the legitimate interest of the Administrator (Article 6(1)(f) of the RODO), consisting of networking in connection with the business.
11. Personal data collected in such cases shall be processed only for the purpose for which they were collected, and the Administrator shall ensure their adequate protection.

RECRUITMENT

12. (As part of recruitment processes, the Administrator expects the transfer of personal data (e.g., in a resume or CV) only to the extent specified in the Labor Code. If the position for which the candidate applies requires the submission of a criminal record certificate, the transfer of the certificate shall be carried out in accordance with applicable laws (Article 6(1)(c) of the DPA). Do not provide information in a broader scope. In case the submitted applications will contain additional data beyond the



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scope indicated by the law, their processing will be based on the candidate's consent (Article 6(1)(a) RODO).

In case the submitted applications contain information inadequate for the purpose of recruitment, they will not be used or taken into account in the recruitment process.

13. personal data shall be processed:

- 13.1. in the case where the preferred form of employment is a contract of employment - in order to perform the obligations under the law, related to the employment process, including in particular the Labor Code - the legal basis for processing is the legal obligation of the Administrator (Article 6(1)(c) of the RODO in connection with the provisions of labor law);
- 13.2. where the preferred form of employment is a civil law contract - in order to conduct the recruitment process - the legal basis for processing the data contained in the application documents is to take action prior to the conclusion of a contract at the request of the data subject (Article 6(1)(b) RODO);
- 13.3. for the purpose of conducting a recruitment process for data not required by law or by the Administrator, as well as for the purpose of future recruitment processes - the legal basis for processing is consent (Article 6(1)(a) RODO or Article 9(1)(a) RODO);
- 13.4. for the purpose of verifying the qualifications and skills of the candidate or candidate and determining the terms and conditions of cooperation - the legal basis for data processing is the legitimate interest of the Administrator (Article 6(1)(f) RODO). The legitimate interest of the Administrator is to verify job candidates and determine the terms of possible cooperation;
- 13.5. in order for the Administrator to establish or assert possible claims or defend against claims made against the Administrator - the legal basis for data processing is the Administrator's legitimate interest (Article 6(1)(f) RODO),
- 13.6. in the case of the use of tests and/or questionnaires during the recruitment process, the Administrator executes them with the candidate's consent (Article 6(1)(a)



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RODO). The candidate has the right to refuse to participate in the completion of the test and/or questionnaire, which does not affect the recruitment process.

14. To the extent that personal data are processed on the basis of consent, you can withdraw it at any time, without affecting the legality of processing carried out before its withdrawal. If consent is given for the purposes of future recruitment processes, personal data shall be deleted no later than after 12 months - unless consent has been withdrawn earlier.
15. The provision of data within the scope specified in Article 22(1) of the Labor Code is required - in the case of the candidate's preference for employment based on an employment contract - by law, including primarily the Labor Code, and in the case of preference for employment based on a civil law contract - by the Administrator. The consequence of failing to provide these data is that a given candidate cannot be considered in the recruitment process. Provision of other data is voluntary.

DATA PROCESSING IN CONNECTION WITH VIDEO MONITORING OF ORLEN TECHNOLOGIE S.A. FACILITIES.

16. The Administrator shall conduct video monitoring on its facilities.
17. Personal data is processed for the purpose of ensuring the safety of persons residing in the Administrator's facilities and protecting the Administrator's property. Video surveillance recordings may be processed for statistical and analytical purposes, i.e. determining the number of persons, vehicles and types and makes of vehicles entering the Administrator's premises. Video surveillance recordings are processed on the basis of the Administrator's legitimate interest (Art. 6.1.f RODO).
18. Video surveillance recordings in justified cases may be made available to law enforcement agencies, only upon their request. Video surveillance recordings are processed for no longer than 1 month, unless they have been secured in connection with a



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law enforcement investigation. In such a case, the storage period of the recordings is extended until the legal conclusion of the case.

COLLECTION OF DATA IN CONNECTION WITH THE HANDLING OF PERSONAL AND MATERIAL TRAFFIC

19. The Administrator shall process personal data of employees and guests staying in the Administrator's facilities in order to ensure security, protection of persons, areas, facilities and equipment of ORLEN TECHNOLOGIE S.A., i.e. ensuring personal and material traffic on the premises of ORLEN TECHNOLOGIE S.A.
20. Personal data are processed in order to:
21. Ensure security, protection of persons, areas, facilities and equipment ORLEN TECHNOLOGIE S.A., i.e. ensuring the movement of persons and materials on the premises of ORLEN TECHNOLOGIE S.A., including the issuance and return of an identification card and the keeping of records (pursuant to Article 6(1)(f) RODO);
22. To ensure the protection of life and health of persons on the premises of ORLEN TECHNOLOGIE S.A. or the protection of property by performing inspections, in compliance with the law and without violating the dignity and other personal rights of the person subject to the inspection (pursuant to Article 9(2)(b) of the RODO) resulting in particular from the Labor Code.
23. handling, investigation and defense in the event of claims arising from the implementation of the purposes of the processing (in accordance with Article 6(1)(f) of the RODO).
24. personal data collected in connection with personal and material traffic shall be processed for a period of:
 - 24.1. in the case of personal data processing related to personal and material traffic, 5 years - from the recording of the last activity in the access control system,



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PROFILES ON SOCIAL NETWORKS AND WEBSITES

25. The Administrator has public profiles on social networks (Facebook, Instagram, Twitter and LinkedIn) and websites. Accordingly, the Administrator processes data left by visitors to these profiles (min. likes, comments, shares).
26. Personal data of such persons is processed to enable them to be active on the profiles, to present information about the initiatives undertaken by the Administrator, to promote various events, services and products, to conduct contests, and for statistical and analytical purposes. In addition, the data of such persons may be processed for the purpose of investigation and defense against claims.
27. The legal basis for the processing of personal data is the legitimate interest of the Administrator (Article 6(1)(f) RODO), consisting of promoting its own brand, improving the quality of its services and, if necessary, investigating and defending against claims.
NOTE: The above information does not apply to the processing of personal data by social network administrators.

VI. RECIPIENTS OF DATA

1. In connection with the conduct of activities requiring the processing of personal data, personal data may be disclosed to external entities, including, in particular, suppliers responsible for the operation of IT systems and equipment, entities providing accounting services, postal operators, couriers.
2. The Administrator reserves the right to disclose selected information concerning the Data Subject to competent authorities or third parties who make a request for such information, relying on the relevant legal basis and in accordance with the provisions of applicable law.

VII. TRANSFER OF DATA OUTSIDE THE EOG

1. The Controller shall not transfer personal data outside the European Economic Area ("EEA").



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If the transfer of personal data outside the EEA is necessary, it will be carried out only with an appropriate degree of protection, primarily by:

- 1.1. cooperation with processors of personal data in countries for which a relevant decision of the European Commission on the determination of an adequate level of protection of personal data has been issued;
- 1.2. applying standard contractual clauses issued by the European Commission;
- 1.3. application of binding corporate rules approved by the relevant supervisory authority;
- 1.4. in the case of transfer of data to the U.S., cooperation with entities participating in the Privacy Shield program (Privacy Shield) approved by a decision of the European Commission.

2. The Administrator shall inform the Data Subject of the intention to transfer personal data outside the EEA at the stage of collection.

VIII. PERIOD OF PERSONAL DATA PROCESSING

1. The period of data processing by the Controller shall depend on the type of service provided and the purpose of processing. The period of processing of the Data may also result from regulations when they provide the basis for processing. If the data are processed on the basis of the legitimate interest of the Administrator - e.g. for security reasons - the data are processed for a period that allows the fulfillment of this interest or until an effective objection to the processing is made. If processing is based on consent, data are processed until the consent is withdrawn. When the basis for processing is the necessity to conclude and perform a contract, data are processed until the contract is terminated.
2. The period of data processing may be extended if the processing is necessary for the establishment or assertion of claims or defense against claims, and after this period - only if and to the extent required by law.



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After the expiration of the processing period, the data shall be irreversibly deleted or anonymized.

IX. RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA RIGHTS OF DATA SUBJECTS

1. Data Subjects shall have the following rights:
 - 1.1. right to information about the processing of personal data - on this basis, the Administrator shall provide the individual making the request with information about the processing of personal data, including, in particular, the purposes and legal grounds for processing, the scope of the data held, the entities to which they are disclosed, and the planned date of deletion;
 - 1.2. the right to obtain a copy of the data - on this basis the Administrator shall provide a copy of the processed personal data concerning the individual making the request;
 - 1.3. right to rectification - the Administrator is obliged to remove any inconsistencies or errors in the processed personal data, and to complete it if it is incomplete;
 - 1.4. right to erasure - on this basis, you can request the erasure of data whose processing is no longer necessary to carry out any of the purposes for which they were collected;
 - 1.5. right to restriction of processing - if such a request is made, the Controller shall cease performing operations on personal data with the exception of operations consented to by the Data Subject - and their storage, in accordance with the adopted retention rules, or until the reasons for restriction of data processing cease to exist (e.g., a decision is issued by a supervisory authority authorizing further data processing);
 - 1.6. the right to data portability - on this basis - to the extent that the data are processed by automated means in connection with a contract concluded or consent given - the Administrator shall issue the data provided by the data subject in a computer-readable format. It is also possible to request that the data be sent to another entity, provided, however, that there are technical capabilities in this regard both on the part of the Administrator and the designated entity;



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- 1.7. right to object to processing - the Data Subject may at any time object, for reasons related to his/her particular situation, to the processing of personal data that is carried out on the basis of the legitimate interest of the Controller (e.g. for marketing, analytical or statistical purposes or for reasons related to the protection of property); the objection in this regard should contain a justification;
- 1.8. right to withdraw consent - if the personal data are processed on the basis of the consent given, the Data Subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before the withdrawal;
- 1.9. right to lodge a complaint - if the processing of personal data is deemed to violate the provisions of the RODO or other regulations on personal data protection, the Data Subject may lodge a complaint with a supervisory authority for personal data processing. In Poland, the supervisory authority is the President of the Office for Personal Data Protection.

SUBMISSION OF REQUESTS RELATED TO THE EXERCISE OF RIGHTS

1. A request for the exercise of the Data Subject's rights may be submitted in writing to the correspondence address of the Controller: ORLEN TECHNOLOGIE S.A., 38-400 Krosno, 8 Naftowa Street, with the annotation "Data Protection" or to the e-mail address: iodo@technologie.pgnig.pl
2. If the Administrator is unable to identify an individual on the basis of the submitted request, it will ask the applicant for additional information. It is not mandatory to provide such data, but failure to do so will result in the denial of the request.
3. A request may be made in person or through a proxy (such as a family member). For reasons of personal data security, the Administrator encourages the use of a power of attorney in the form certified by a notary public or an authorized legal counsel or attorney, which will significantly speed up the verification of the authenticity of the request.



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4. The request will be responded to within 30 days of receipt. If it is necessary to extend this period, the Administrator will inform the applicant of the reasons for this action and the period within which the request will be fulfilled.
5. The Administrator shall respond to the request in the same form in which it was addressed to the Administrator, unless the applicant has requested a response in a different form. If the timing of the request prevents the Administrator from responding in writing, and the scope of the applicant's personal data processed by the Administrator allows for electronic contact, the Administrator shall respond electronically.
6. The Administrator shall store information regarding the request made and the person who made the request in order to ensure that compliance can be demonstrated and for the purpose of establishing, defending or asserting potential claims by data subjects.