

Information for Contractors of Arctic Paper Kostrzyn S.A. and their employees / co-workers

Pursuing the legal obligation imposed on the Data Controller by the provisions of Article 13 and Article 14 of the 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 (General Data Protection Regulation) hereinafter referred to as the "Regulation", we inform you that:

1. Personal Data Controller

The controller of your personal data is Arctic Paper Kostrzyn S.A. with its registered office in Kostrzyn nad Odrą. You may contact us in the following ways:

- a) by mail to the address: ul. Fabryczna 1, 66-470 Kostrzyn nad Odrą;
- b) by e-mail: info@arcticpaper.com;
- c) by phone: +48 957210600

2. Personal Data Protection Officer

We have appointed a data protection officer. This is the person you can contact on all matters concerning the processing of your personal data and the exercising of your rights related to the fact that we process your data. You can contact the Data Protection Officer in the following ways:

- a) by mail to: Data Protection Officer, Arctic Paper Kostrzyn SA, ul. Fabryczna 1, 66-470 Kostrzyn nad Odrą;
- b) by e-mail: DPO@arcticpaper.com;
- c) by phone: +48 957210664

3. Data categories, purposes of processing and legal basis for processing data of your employee/co-worker

3.1 If you are an employee/co-worker of a Controller's Contractor we will process the following personal data of yours:

- a) identifying data (e.g. name, surname),
- b) contact details (e.g. email address, telephone number, fax number),
- c) data concerning your occupation or business activity, your participation in a civil partnership, employment with the Controller's Contractor or cooperation with the Controller's Contractor (e.g. company name, position).
- d) data concerning your ability to perform work, including work with special legal constraints, such as: information about the validity and category of health and safety training, information about the validity of an occupational health physician's certificate, information and qualification categories of work with special legal constraints if the scope of the Contract concerns it.

3.2. Your personal data has been provided (made available) to us by your employer or the person (company) you work with (hereinafter referred to as the Controller's Contractor) in connection with entering into a contract with us, including the Controller's Contractor's participation in a tender process or other contracting or contractor selection process, as well as the Controller's Contractor's performance (inclusive of acting as a subcontractor) of the contract entered into with us (hereinafter collectively referred to as the Contract).

3.3. We will process your personal data for:

- a) the conclusion, execution and monitoring of the performance of the Contract with the Controller's Contractor, in particular for purposes such as communication, fulfilment of information obligations, cooperation and other obligations under the Contract - for the period preceding the conclusion of the Contract and for the period of performance of the Contract [legal basis Art. 6 (1) (f) of the Regulation - implementation of the Controller's legitimate interest in the form of performance of the Contract with the Controller's Contractor];
- b) archiving to the extent necessary for the fulfilment of legal obligations, in particular tax regulations, regulations on accounting - for the period resulting from these regulations [legal basis Art. 6 par. 1 c) of the Regulation - fulfilment of the obligation imposed by law];
- c) possible establishment and assertion of claims or defence against claims, including sale of receivables - for the duration of proceedings and the period of limitation of potential claims [legal basis Art. 6(1)(f) of the Regulation - execution of the controller's legitimate interest in the form of asserting claims and defence against claims related to the Contract];
- d) creating analyses of the results of our business activity for internal needs - for a period no longer than that indicated in points b) and c) [legal basis Art. 6 (1) (f) of the Regulation - execution of the controller's legitimate interest in the form of optimisation of business activity].

4. Categories of data, purposes of processing and legal basis for processing of the Contractor's / Contractor Representative's data

4.1 If you are a Controller's Contractor / Contractor's Representative we will process the following personal data of yours:

- a) identifying data (e.g. name, surname),
- b) contact data (e.g. e-mail address, telephone number, fax number),
- c) data concerning your profession or business activity, your participation in a civil partnership, employment with the Administrator's Contractor or cooperation with the Administrator's Contractor (e.g. company name, position).

4.2. We will process your personal data for:

- a) entering into a contract with us, including in connection with your participation in a bid collection process or other procedure relating to the conclusion of contracts or the selection of contractors, as well as executing and monitoring the performance of the contract you have entered into with us (hereinafter collectively referred to as the Contract) - for the period prior to the conclusion of the Contract and for the period of performance of the Contract [Article 6(1)(b) of the Regulation - conclusion and performance of the Contract];

- b) archiving to the extent necessary to comply with legal obligations, in particular tax and accounting regulations - for the period resulting from these regulations [legal basis Art. 6(1)(c) of the Regulation - compliance with the obligation imposed by law];
- c) possible establishment and enforcement of claims or defence against claims, including sale of receivables - for the duration of proceedings and the period of limitation of potential claims [legal basis Art. 6(1)(f) of the Regulation - execution of the controller's legitimate interests in the form of enforcement of claims and defence against claims related to the Contract];
- d) verification of contractor's credibility - i.e. performance of necessary actions in the form of assessment of risks (legal, financial, image and reputation) before the conclusion of the Contract, after its conclusion, during the performance of the Contract or extension of the Contract. While realizing this purpose, we may additionally obtain your data from business information registers, business intelligence agencies and other generally available information sources. The personal data referred to in the preceding sentence will concern the payment of your obligations and the business activities conducted by you [legal basis Art. 6(1)(f) of the Regulation - implementation of the controller's legitimate interest], for the period necessary for such an assessment;
- e) create an analysis of the results of our business activities for internal purposes - for a period no longer than that indicated in points b) and c) [legal basis Art. 6(1)(f) of the Regulation - implementation of the controller's legitimate interest in optimising its business activities].

5. The processing of personal data on the basis of Article 6(1)(f) of the Regulation, i.e. the exercise of a legitimate interest, is preceded by verification of the existence of a legitimate legal interest and of a risk of infringement of your rights or interests in the form of a balancing test. You are entitled to access the conclusions of this test.

6. Your rights

6.1. In relation to the processing of your personal data, you also have the following rights:

- a) the right of access to your personal data,
- b) the right to rectify your data,
- c) the right to erasure of the data,
- d) the right to restrict the processing of your personal data,
- e) the right to transfer the data,
- f) the right to object.

To exercise the above specified rights, please contact us or our Data Protection Officer as indicated in 1 or 2 above.

6.2. Right to lodge a complaint with a supervisory authority.

If you believe that we are violating the law by processing your personal data, you have the right to lodge a complaint with the supervisory authority of the President of the Office for Personal Data Protection.

7. Processing by third countries

Data shall not be transferred to recipients in countries outside the European Union ('third countries').

8. Information on the requirement/freedom to provide data

The provision of personal data is a necessary condition for the execution of the contract or pre-contractual action. If you do not provide your personal data, it will not be possible to perform the contract or take pre-contractual action.

9. Automatic decision making

However, the processing of your personal data does not involve automated decision-making, inclusive of profiling.

10. Recipients of data

The prospective recipients of your personal data are:

- a) other controllers who process personal data on their own behalf:

entities that are authorised to receive your personal data on the basis of the relevant legislation, entities that carry out postal or courier activities, entities that carry out payment activities (banks, payment institutions - in order to carry out mutual settlements, including payments to you), entities that purchase receivables and debt collection entities - in the event that you fail to fulfil your obligations under the Contract, entities that cooperate with us in handling accounting, tax, legal matters - to the extent that they become the data controller,

- b) entities that process personal data on our behalf:

authorised employees of the Controller and entities from the Arctic Paper S.A. Group. (subsidiaries or affiliated companies), entities that operate ICT systems and provide IT services, entities that provide us with advisory, consulting, audit, legal, tax, accounting assistance, entities that provide document archiving services, our subcontractors, i.e. entities that perform a service for us or deliver goods covered by the Contract or contracts with our customers, the performance of which is related to the Contract, to the extent to which it is necessary for the purposes of processing your personal data.