

OBLIGATION OF INFORMING

In accordance with Articles 13 and 14 of 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 repeal of Directive 95 / 46 / WE (hereinafter: "**RODO**"), the company Confirno Sp. z o.o. with its registered office in Warsaw (hereinafter referred to as "the Company"), hereby informs about the rules of processing your personal data in the company:

1. Who is the administrator of my personal data? The administrator of your personal data is a company under the name of Confirno Sp. z o.o. with headquarters in Warsaw, No 19 Słomińskiego St. Phone .: +48 22 637 50 73

2. What are the purposes (reasons) for processing my personal data by the Company? Your personal data will be processed for the purposes of: advertising, statistical, direct marketing, promotion, information about the activities carried out by the Company, as well as for the purpose of performing the contract to which you are party or to take action on your behalf which it may be necessary for us to conclude any contract with us, and finally for purposes arising from legally justified interests pursued by the Company as a data controller - indicated further in this information.

In each case of processing personal data by our Company, at least one of the above premises prevails. The company does not process personal data if it is unable to demonstrate the necessity of processing for any of the above purposes.

3. Where from the Company has my personal data? Most probably we have obtained your personal data directly from you - this is the main source of data available to the Company. Most often, therefore, through direct contact between you and the Company, regardless of who initiated this contact.

However, it may happen that you did not provide us with your personal data - in this case your personal data most often come from your closest friends or direct colleagues who, by contacting us for some reason, decided that we should also have your personal information. The most common is when the Company addresses its activities not only directly to the person who has asked the Company, but at the request of those persons - also to interested third parties who do not directly contact the Company or do not initiate any contact in this regard. (e.g. it refers to people indicated as CC -"for information" in the mailing list in email inquiries addressed to the Company).

Often, we must also have the data of people who have not made it available to us in order to be able to conclude an agreement on the acquisition of the Company's products with all relevant entities.

At the moment when we found your data in the manner described above, we can take action against you for achieving the objectives described in point. 2 above.

4. In a situation where the Company has not obtained my data from me, what categories of my data does the Company process? The company most often processes data of persons from whom it did not obtain them directly, in the scope of: identifying data (name / names, surname / surnames, sex, PESEL number, NIP, type and number of identity card) and contact details (contact address, e-mail address, contact telephone number). In the case of persons - representatives of legal entities/ authorities of a legal entity - we also have information about the position held in the structures of such a legal person. The scope of personal data that the Company processes depends on the individual situation and need and may be different; we try to take action to minimize the need for certain categories of data.

5. What is the legal basis for the processing of my personal data by the Company? The processing of personal data requires a legal basis. The RODO provides for several types of such legal bases, and in the case of the Company, we deal essentially with three legal grounds for the processing of personal data:

- Article 6 para. 1 lit. a) RODO - consent of the person to whom the data apply for data processing - this premise for the legitimacy of personal data processing occurs in principle only if we want to provide marketing / commercial information from the Company or third parties or when we want to process specific types of personal data (so-called sensitive data); we try, however, to marketing, commercial or promotional content that we would like to provide was not addressed to people who do not want it - hence, before our company undertakes marketing, advertising or promotional activities, we will seek your consent to the processing of personal data in the above permitted purposes
- Article 6 para. 1 lit. b) RODO - indispensability to perform the contract, to which the data subject is a party, or to take action at the request of the data subject before concluding the contract - this condition of legality of processing personal data by the Company will occur relatively frequently - in a situation where when we make a contract with you to purchase a product or products of the Company, or we will take preparatory steps to conclude such a contract at your request;
- Article 6 para. 1 lit. f) RODO - legally justified interest carried out by the data controller - this premise will occur most often. It concerns cases where the processing of personal data is justified due to our justified needs.

6. What is the legitimate interest pursued by the data administrator? The legitimate interest of the administrator is marketing of the Company's own products and the need to implement the core business of the Company, which is the catering activity. For this purpose, we process your data to:

- be able to contact you, including as part of allowed marketing activities, in particular and for your consent - by e-mail and telephone;
- handle your requests, requests, inquiries, etc.,
- to be able to organize loyalty programs, competitions and promotional campaigns in which you may take part
- to be able to improve our products and adjust them to the needs and convenience of future users / buyers
- to be able to collect debt or to conduct court, arbitration and mediation proceedings,
- to be able to conduct statistical analyses,
- store data for archiving purposes, and to ensure accountability (ie. demonstrate that the Company fulfills its obligations under the law)
- additionally, the law may require that we process / Your data for tax, accounting and reporting purposes.

7. To whom can the Company disclose my personal data in accordance with the law? Your personal data, depending on the specific need justified by the legal or factual relationship between us, may be made available to: (1) direct marketing, legal and accounting advisors of the Company - for purposes related to the preparation of the offer to purchase a product or products of the Company and their legal and formal assessment; (2) auditing companies - for purposes related to the audit of annual reports on the Company's operations; (3) an IT company servicing the Company's IT system; (4) selected state institutions and industry organizations in accordance with the legislation in force in Poland; (5) shareholders of the Company - for purposes related to the fulfillment of the Company's

reporting or information obligations towards its shareholders and in order to ensure the shareholders exercise their rights resulting from ownership rights in the Company; (6) notarial offices, in order to conclude a preliminary or promised contract or grant powers of attorney, resulting from contracts concluded with you or preparation of such declarations in a notarial form.

The above catalog and the calculation is exemplary and in a specific situation your data will be transmitted only to selected recipients and in line with justified needs.

8. Will the Company transfer my personal data to a third country (ie outside the EEA) or an international organization? Your personal data will not be transferred to a third country / international organization without your consent, but it is possible to transfer your data to a third country in a situation where the email administrator you use in your contacts with the Company, uses servers located physically outside the EEA.

9. For what period will my personal data be stored in the Company? Your personal data will be stored until there is a basis for processing - that is, if consent is granted - until it is revoked, limited or otherwise acted upon by you in a way restricting that consent; in the event of necessity of data for the performance of the contract - for the time of its execution and the time necessary for the parties to complete the contract and fulfill its claims, and if the basis for processing the data is a legitimate interest of the administrator - until such a legitimate interest exists (i.e. till the day when further processing of your personal data will prove unreasonable in view of the purpose it was intended to serve) .

10. What rights do I have in relation to the processing of my personal data by the Company? In relation to the processing of your personal data by the Company, you have the right to:

- withdraw your consent to the processing of personal data at any time, if the processing of your data by the Company is based on this - without affecting the legality of the current processing which was made on the basis of consent before its withdrawal, pursuant to art. 13 para. 2 lit. c) THE RODO,
- the right to access the content of your data, pursuant to art. 15 RODO,
- the right to correct your data, pursuant to art. 16 OF THE GDPR,
- the right to delete your data, pursuant to art. 17 RODO (this right can not be in conflict with the legal acts in force in Poland),
- the right to limit the processing of your data, based on art. 18 GDPR,
- right to object to the processing of data, pursuant to art. 21 RODO; the right to object - at any time, free of charge to the processing of personal data - applies in particular to the situation in which your data is processed for direct marketing purposes,
- the right to transfer your data, pursuant to art. 20 OF THE RODO,
- if you acknowledge that the processing of your personal data violates the provisions of the RODO, you also have the right to lodge a complaint with the President of the Office for Personal Data Protection.

11. Do I have to provide the Company with my personal data? Providing by you the necessary personal data is a condition for the Company to accomplish the goal referred to in point. 2 above. Providing data is voluntary, however, the consequence of not providing data is the inability of the Company to perform the activities referred to in point 2 above.

12. Will the Company automatically make decisions effecting me or carry out automated profiling (eg with the use of algorithms)? The company does not carry out automated decision-making and

automatic profiling of personal data. The processing of your data will take place both manually and with the use of an ICT system.

13. Are there specific protection procedures for my personal data in the Company? In the Company, we attach great importance to the protection of personal data that we have acquired. To this end, we implemented in our activity a Personal Data Protection Policy compliant with the requirements of the GDPR, compliance with which ensures protection of personal data entrusted to us against unauthorized processing. Acting in accordance with the Data Protection Policy introduced is one of the most important priorities for us.