



## Information on the processing of personal data by IZOBLOK S.A.

### 1. Who is the administrator of your personal data?

The administrator of personal data (hereinafter referred to as "**Data**") processed by us in connection with conducting business activity is IZOBLOK S.A. with its registered office in Chorzów (41-503), 15 Legnicka Street, hereinafter referred to as **the Administrator** or **IZOBLOK**. IZOBLOK is a member of the IZOBLOK Capital Group. A list of all companies from the IZOBLOK Group can be found here [<https://www.izoblok.pl/o-izoblok#gkizoblok>].

The data is processed in accordance with the currently applicable regulations, including the General Data Protection Regulation (GDPR).<sup>1</sup>

Data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 2. How do we process Data?

IZOBLOK takes special care to protect the interests of Data subjects, and in particular ensures that the Data collected are:

- processed lawfully, fairly and transparently for the Data subject;
- collected for specific, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes;
- adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- correct and updated where necessary;
- stored in a form that permits identification of the Data subject for no longer than is necessary for the purposes for which the Data is processed;
- processed in a manner that ensures appropriate data security, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organizational measures.

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<sup>1</sup> Regulation 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



### **3. When do we process the Data?**

We process data in many situations. These may be situations in which you have provided us with your Data personally through various communication channels (e.g. to submit your application, send an inquiry / offer by e-mail or phone) or as part of our cooperation when signing or performing a contract, but also when we have obtained your Data from other sources (e.g. from the company with which you cooperate, and who is our contractor / client).

### **4. Data processing in connection with business relationships and contact.**

#### **a. What Data do we process in connection with the business relationship and contact?**

As the Controller, we process the Data of our business partners (investors, contractors), their proxies, employees / associates, Data of other persons provided to us as part of the performance of contracts, as well as other persons contacting us by phone or e-mail.

In connection with the business relationship and contact, we may process the following Data: Identification Data, Contact Data, Job title and professional qualifications Data and other Data provided to us in connection with the cooperation or contact.

We obtain the above Data directly from Data subjects, from other administrators, e.g. employers/clients or come from publicly available sources.

#### **b. What is the purpose and basis of the processing of Data in connection with business relations and contact?**

In connection with the business relationship and contact, we process the Data for the following purposes:

- establishing cooperation;
- conclusion and performance of the contract;
- settlement of contracts;
- respond to any inquiries or requests addressed and conduct further correspondence / contact in this regard;
- marketing and contact regarding other information and services of IZOBLOK;
- fulfilling legal obligations incumbent on the Administrator,
- defense against potential claims, as well as for the purpose of possibly directing claims.



The basis for the processing of Data by IZOBLOK is:

- necessity to perform a contract or to take steps prior to its conclusion at the request of the Data subject;
- fulfilling legal obligations imposed on the Administrator;
- legitimate interest of the Administrator in the form of marketing of products and services of the Administrator or a third party, contact, including correspondence and defense or pursuit of potential claims.

Providing the Data is voluntary, but necessary to conclude or perform a contract or to respond to an inquiry or to conduct correspondence. Failure to provide the Data may result in the inability to conclude or perform the contract or to respond to the inquiries addressed and to conduct further correspondence.

**c. How long will the Data be processed in connection with the business relationship and contact?**

The data collected for the purposes of concluding and performing the contract will be processed for the duration of the contract, and then until the expiry of the limitation period for possible claims or for the period resulting from the provisions of law, whichever expires later.

The data of persons who have contacted IZOBLOK will be processed for the period necessary to respond and possibly conduct correspondence, and then until the expiry of the limitation period for possible claims or for the period resulting from the provisions of law, depending on which of these periods expires later.

**d. Who is the recipient of the Data in relation to the business relationship and contact?**

The data processed by us in connection with business relations and contact may be transferred to other companies from the IZOBLOK Group, our business partners and our other contractors supporting us in the organization of work, IT services, marketing, correspondence handling and providing advisory, consulting, auditing, legal, tax or accounting services – to the extent necessary to carry out cooperation and improve internal processes in the structure of the Administrator.

**5. Data Processing in Connection with Recruitment.**

**a. What Data do we process in connection with recruitment?**

As the Controller, we process the Data of persons applying for employment provided through all available recruitment channels, including in particular all Data provided to us as part of the application and collected as part of the recruitment process.



In connection with the recruitment process, we may process the following Data (the processing of some Data may depend on your consent): Identification Data, Contact Data, Education Data, Data on professional qualifications and previous employment and other Data provided to us during the recruitment process, including those indicated in the recruitment documents.

The above Data may be obtained directly from data subjects, from third parties (e.g. as part of an employee referral system or from recruitment agencies).

**b. What is the purpose and basis of the processing of Data in connection with recruitment?**

In connection with recruitment, we process Data for the following purposes:

- consider the candidacy and carry out the current recruitment process, and in the case of consent, also for the purposes of future recruitments conducted by the Administrator or recruitments conducted within the IZOBLOK Group;
- possible establishment of an employment relationship,
- defense against potential claims, as well as for the purpose of possibly directing claims.

The basis for the processing of Data by the Administrator is:

- taking action at the request of the data subject before concluding the contract,
- provisions of applicable law, in particular the Labour Code and executive acts, and in the scope broader than specified in these regulations and in the scope of future recruitment processes, your consent,

legitimate interest of the Administrator in the form of defense or pursuit of potential claims.

Providing the Data is voluntary, but necessary to carry out the recruitment process and establish possible further cooperation. Failure to provide them will prevent participation in the recruitment process. As regards consent to participate in future recruitments, failure to do so will result in not receiving information about new job offers.

**c. How long will the Data be processed in connection with recruitment?**

The data will be processed for the duration of the recruitment process or, depending on the additional voluntary consent, future recruitments – until the consent is withdrawn or they are no longer valid or no longer useful for specific purposes. The Administrator reserves the right to process the Data for a longer period of time if it is required by law and in the event of potential claims – for the period of their limitation specified by the provisions of law, in particular the Labor Code and the Civil Code.



**d. Who is Recipient Data in connection with recruitment?**

The data processed by us in connection with the recruitment may be transferred to other companies from the IZOBLOK Group, entities supporting the Administrator in the recruitment process, entities providing IT services to the Administrator, legal advisors and other entities supporting the Administrator in conducting its business.

**6. Does your Data go outside the European Economic Area (EEA)?**

As a rule, the Data will be processed within the European Economic Area (EEA). However, the data may be transferred to our partners who process them outside the European Economic Area, but only to the extent necessary related to the Controller's cooperation with these partners.

In such a case, the Data will be transferred to countries for which the European Commission has found an adequate level of protection, and in the absence of a decision of the European Commission, the data security will be ensured by the safeguards applied by the Administrator, m.in. standard contractual clauses approved by the European Commission.

You can obtain a copy of the security features of your Data transferred to these countries by contacting the Controller (contact details indicated above).

**7. What rights do you have?**

On the terms set out in the applicable regulations, you have the right to:

- request access to the Data, including the right to obtain a copy of it;
- request their rectification, deletion or restriction of processing;
- object to their processing – to the extent that the basis for the processing is the legitimate interest of the Administrator, on the terms resulting from the provisions of law;
- transfer them to another administrator (to the extent that the basis for their processing is the necessity to perform the contract or your consent).

If the Data processing is based on consent, you have the right to withdraw it at any time, without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal. Withdrawal of consent does not affect the possibility of processing by the Data Controller on grounds other than consent.

You always have the right to lodge a complaint with the President of the Office for Personal Data Protection – on the terms resulting from the provisions of law.



**8. Contact:**

In matters related to the processing of Data, you can contact the Controller at the following e-mail address: [rodo@izoblok.pl] or in writing to the address of the Controller's registered office (indicated in point 1).

**9. Is the Data subject to automated decision-making, including profiling?**

The Controller does not undertake activities consisting in automated decision-making, including profiling, with respect to persons whose Data is processed.