# Privacy Policy

Information on the Personal Data Controller.

The Controller of personal data is J.S. Hamilton Poland Sp. z o.o. with its registered office in Gdynia at ul. Chwaszczyńska 180, 81-571 Gdynia, NIP (Tax Identification No.): 5860006039, REGON (Business ID No.): 002893048, KRS 0000778120.

Information on the Data Protection Officer.

Designated by J.S. Hamilton Poland Sp. z o.o. The Data Protection Officer is Mr Jakub Gosz.
The officer may be contacted as follows:

- by post to: J.S. Hamilton Poland Sp. z o.o., Inspektor Danych Osobowych, ul. Chwaszczyńska 180, 81-571 Gdynia;
- by e-mail: iodo@jsh.com.pl

Information on recipients of personal data.
Your personal data may be disclosed to the following categories of recipients:

- authorized employees and partners of J.S. Hamilton Poland Sp. z o.o.,
- entities providing selected services to J.S. Hamilton Poland Sp. z o.o., including: legal, marketing, employment agency, postal and courier services, as well as to the personal data inspector.

Data will only be disclosed to trusted recipients and processed only to the extent necessary for the provision of services to J.S. Hamilton Poland Sp. z o.o.

Information on the purposes, legal bases and period of personal data processing of:

PERSONS APPLYING FOR EMPLOYMENT BASED ON EMPLOYMENT CONTRACT:

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 1. | Evaluation of qualifications, skills and abilities needed to work in a | Provision of law (Article $22_1$ § 1 of the Labour Code) in the scope of: first name and surname; date of birth; contact | Until this recruitment is completed. |

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| | position for which recruitment is conducted and selection of an appropriate person to work in J.S. Hamilton Poland Sp. z o.o. | details; education; professional qualifications; course of previous employment.<br><br>Consent (Article 6(1)(a) of the GDPR) to the processing of data provided in the CV and letter of motivation if data other than those indicated above have been provided on candidate's own initiative.<br>Legitimate interest (Article 6(1)(a) of the GDPR) in the scope of data collected during a job interview. The legitimate interest is to check the skills and abilities to assess and select the most suitable candidate. | |
| 2. | Preparation of documentation necessary to conclude a contract of employment. | Provision of law (Article $22_1$ § 1 of the Labour Code) in the scope of: first name and surname; date of birth; contact details; education; professional qualifications;<br><br>The necessity to process personal data in order to conclude a contract of employment (Article 6(1)(b) of the GDPR). | Until this recruitment is completed. |
| 3. | Conducting future recruitment processes. | The grounds specified in point 1, as well as a separate consent (Art. 6(1)(a) of the GDPR) to process data in future recruitment processes. | Until the consent has been withdrawn, but not longer than 2 years. |

Information on the rights of the data subject.

In connection with the processing of your personal data, you have the following rights in relation to these data:

- the right to access and receive copies thereof, provided that the right to obtain a copy does not adversely affect the rights and freedoms of other persons,
- the right to rectify (correct) your data if they are incorrect,
- the right to erase personal data in a situation where the processing of data does not take place in order to fulfil the obligation under the law and is not necessary for the establishment, exercise or defence of claims,
- the right to revoke the consent if the processing of your personal data takes place on the basis of the consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal,
- the right to object to the processing of data, due to your particular situation, in cases where the data are processed in connection with the implementation of the legitimate interest of J.S. Hamilton Poland Sp. z o.o.,
- the right to restrict processing,
- the right to transfer personal data processed in an automated manner on the basis of the consent or agreement,
- the right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office, ul. Stawki 2; 00-193 Warsaw

Information on the obligation to provide data.

- Providing data is voluntary, although it is necessary to conduct the recruitment process.
- Without providing data, it is not possible to participate in the recruitment process.
- Information on automated data processing, including profiling.
- Your personal data will not be used to make automated decisions, including profiling.
- Information on transfers outside the European Economic Area.
- Your personal data will not be transferred to third countries, i.e. outside the European Economic Area.

PERSONS APPLYING TO ESTABLISH COOPERATION UNDER THE CIVIL LAW CONTRACT

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 4. | Assessment of qualifications, skills and abilities necessary for the performance of tasks within the framework of cooperation and selection of an appropriate person to cooperate with J.S. Hamilton Poland Sp. z o.o. | The necessity to process personal data to take actions before the conclusion of an agreement and to conclude an agreement (Article 6(1)(b) of the GDPR)<br><br>Legitimate interest (Article 6(1)(a) of the GDPR) in the scope of data collected during a job interview. The legitimate interest consists in the need to check the skills and abilities to assess and select the most appropriate candidate for establishing cooperation. | Until this recruitment is completed. |
| 5. | Preparation of documentation necessary to conclude an agreement (contract for cooperation, contract for specific task or contract of mandate) | The necessity to process personal data for the conclusion of an agreement (Article 6(1)(b) of the GDPR) | Until this recruitment is completed. |
| 6. | Conducting future recruitment processes | The grounds specified in point 1, as well as a separate consent (Art. 6(1)(a) of the GDPR) to process data in future recruitment processes | Until the consent has been withdrawn, but not longer than 2 years. |

Information on the rights of the data subject.

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- the right to rectify (correct) your data if they are incorrect,

- the right to erase personal data in a situation where the processing of data does not take place in order to fulfil the obligation under the law and is not necessary for the establishment, exercise or defence of claims,
- the right to revoke the consent if the processing of your personal data takes place on the basis of consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal,
- the right to object to the processing of data, due to your particular situation, in cases where the data are processed in connection with the implementation of the legitimate interest of J.S. Hamilton Poland Sp. z o.o.,
- the right to restrict processing,
- the right to transfer personal data processed in an automated manner on the basis of consent or agreement,
- the right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office, ul. Stawki 2; 00-193 Warsaw

Information on the obligation to provide data.

Providing data is voluntary, although it is necessary to conduct the recruitment process. Without providing data, it is not possible to participate in the recruitment process.

Information on automated data processing, including profiling.

Your personal data will not be used to make automated decisions, including profiling.

Information on transfers outside the European Economic Area.

Your personal data will not be transferred to third countries, i.e. outside the European Economic Area.

POTENTIAL COUNTERPARTIES, EMPLOYEES AND PARTNERS OF COUNTERPARTIES:

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 7. | Implementation of tasks aimed at concluding the agreement. | Processing is necessary to take actions before the conclusion and execution of the contract (Article 6(1)(b) of the GDPR). | 10 years from the end of a calendar year from the next year in which the actions aimed at concluding |

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| | | | the agreement have been completed. |
| 8. | Implementation of the agreement. | Processing is necessary to take action before the conclusion and execution of the contract (Article 6(1)(b) of the GDPR). | 10 years from the end of a calendar year from the next year in which the contract was terminated. |
| 9. | Keeping tax and accounting - records. | Processing is necessary to fulfil the legal obligation (Article 6(1)(c) of the GDPR) in connection with Article 74 of the Accounting Act and other taxes. | 5 years from the end of a calendar year from the next year in which the contract was terminated. |
| 10. | Preparing and providing a reply to an inquiry or anther notification. | The processing is necessary for the purposes of the controller's legitimate interests (Article 6(1)(f) of the GDPR) involving the possibility of submitting a response to a question or notification concerning the activity of J.S. Hamilton Poland Sp. z o.o. | The period of maintaining current relationships, e.g. answers to questions, submitting tenders, exchanging correspondence. |
| 11. | Managing, investigation and defence in the event of mutual claims. | Processing is necessary for the purposes of legitimate interests of the controller (Article 6(1)(f) of the GDPR) concerning the right of defence or an investigation in the event of mutual claims. | During the period in which the parties may be entitled to the conversion of civil law claims (the period of limitation for claims). |
| 12. | Handling of complaints, requests. | Processing is necessary for the purposes of the controller's legitimate interests (Article 6(1)(f) of the GDPR) regarding protecting the quality and image of the entrepreneur. | 10 years from the end of a calendar year from the next year in which the execution of the agreement was completed. |

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 13. | Direct marketing. | Processing is necessary for the purposes of the controller's legitimate interests (Article 6(1)(f) of the GDPR). | Until the objection has been raised. |

Information on the rights of the data subject.

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- the right to rectify (correct) your data if they are incorrect,
- the right to erase personal data in a situation where the processing of data does not take place in order to fulfil the obligation under the law and is not necessary for the establishment, exercise or defence of claims,
- the right to revoke the consent if the processing of your personal data takes place on the basis of consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal,
- the right to object to the processing of data, due to your particular situation, in cases where the data are processed in connection with the implementation of the legitimate interest of J.S. Hamilton Poland Sp. z o.o.,
- the right to restrict processing,
- the right to transfer personal data processed in an automated manner on the basis of consent or agreement,
- the right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office, ul. Stawki 2; 00-193 Warsaw

Information on the obligation to provide data.

Providing data is voluntary, although it is necessary to reply to a query or another notification. Without providing the data, it will not be possible to establish efficient communication.

Information on automated data processing, including profiling.

Your personal data will not be used for automated decision-making, including profiling.

Information on transfers outside the European Economic Area.

Your personal data will not be transferred to third countries, i.e. outside the European Economic Area.

PERSONS CONTACTING J.S. HAMILTON POLAND SP. Z O.O. FOR PURPOSES OTHER THAN ESTABLISHING COOPERATION, EXISTING COOPERATION OR RECRUITMENT:

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 14. | Preparing and providing a reply to an inquiry or anther notification | A legitimate interest (Article 6(1)(f) of the GDPR) consisting in the possibility of submitting a response to a question or a notification concerning the activity of J.S. Hamilton Poland SP. Z O.O. | The period of maintaining current relationships, e.g. answers to questions, submitting tenders, exchanging correspondence. |
| 15. | Service, investigation and defence in case of mutual claims | A legitimate interest (Art. 6(1)(f) of the GDPR) consisting in the right of defence or an investigation in the event of mutual claims | For the period in which the parties may be entitled to a civil law claim (the period of limitation for claims) |

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- the right to revoke the consent if the processing of your personal data takes place on the basis of consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal,

- the right to object to the processing of data, due to your particular situation, in cases where the data are processed in connection with the implementation of the legitimate interest of J.S. Hamilton Poland Sp. z o.o.,
- the right to restrict processing,
- the right to transfer personal data processed in an automated manner on the basis of consent or agreement,
- the right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office, ul. Stawki 2; 00-193 Warsaw

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VISITORS OF THE PREMISES OF J.S. HAMILTON POLAND SP. Z O.O.

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 16. | Ensuring the safety of persons staying on the premises of the facility occupied by J.S. Hamilton Poland Sp. z o.o. J.S., protection of property of J.S. Hamilton Poland Sp. z o.o. and maintaining the confidentiality of information whose disclosure could damage the interests of | The legitimate interest of the data controller (Article 6(1)(f) of the GDPR) consisting in the need to ensure security within the premises occupied by J.S. Hamilton Poland SP. Z O.O. and the possibility of identifying persons located on the premises of the facility. | The data collected in the entry and exit log will be stored for a maximum period of 6 months from the date of recording.<br><br>The data collected on the video surveillance recordings will be stored for a maximum period of 3 |

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| | J.S. Hamilton Poland Sp. z o.o. | | months from the recording date. |

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- the right to object to the processing of data, due to your particular situation, in cases where the data are processed in connection with the implementation of the legitimate interest of J.S. Hamilton Poland Sp. z o.o.,
- the right to restrict processing,
- the right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office, ul. Stawki 2; 00-193 Warsaw

Information on the obligation to provide data.

Providing data is voluntary, although necessary in order to move around the premises occupied by J.S. Hamilton Poland Sp. z o.o.

Information on automated decision-making, including profiling.

Your personal data will not be used to make automated decisions, including profiling.

Information on transfers outside the European Economic Area.

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PERSONS USING THE WEBSITE OF J.S. HAMILTON POLAND SP. Z O.O.

| # | PURPOSE OF PROCESSING | LEGAL BASIS OF PROCESSING | PERIOD OF PROCESSING |
|---|---|---|---|
| 17. | Marketing activities. | A legitimate interest (Article 6(1)(f) of the GDPR) consisting in conducting marketing activities of J.S. Hamilton Poland Sp. z o.o. | Until the request for erasure has been filed. |

Information on recipients of personal data.

Your personal data may be disclosed to the following categories of recipients:

- authorized employees and partners of J.S. Hamilton Poland Sp. z o.o.,
- entities providing selected services to J.S. Hamilton Poland Sp. z o.o., including analytical, marketing services provided on websites.

Data will only be disclosed to trusted recipients and processed only to the extent necessary for the provision of services to J.S. Hamilton Poland Sp. z o.o.

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- the right to restrict processing,
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