

## **PRIVACY POLICY BEDNARZ**

This Privacy Policy aims to provide information regarding the processing of personal data and the basic rights related to their processing by Mateusz Bednarz LAW&CONSULTING (hereinafter referred to as "**Bednarz**").

This Privacy Policy fulfills the obligations referred to in Article 13 and 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 "**GDPR**").

Bednarz informs that the Privacy Policy applies to the following entities:

1. Bednarz's clients and their proxies or representatives.
2. Bednarz's contractors and their proxies, representatives, as well as persons indicated by Bednarz's contractors, including employees or collaborators.
3. Participants in events organized by Bednarz.
4. Individuals interested in employment or cooperation with Bednarz.
5. Other individuals contacting Bednarz by phone, email, or through social media, and individuals contacted by Bednarz by phone, email, or through social media.
6. Data collected through Bednarz's profiles on social media platforms.

This policy is regularly updated to reflect the measures taken by Bednarz regarding the processing of personal data. Information about updates to the privacy policy will be posted on the [mbednarz.pl](http://mbednarz.pl) website.

### **1. Processing of Personal Data by Bednarz**

1. In the scope of marketing, sales of services, and in the context of relationships with you, the controller of personal data is always MATEUSZ BEDNARZ LAW&CONSULTING with its registered office in Warsaw (00-203) at Bonifraterska 17/6 floor.
2. In the course of Bednarz's activities, personal data are collected and processed for the following purposes:
  - a) for the purposes arising from Bednarz's legitimate interests;\
  - b) personal data will be processed by Bednarz in the scope of providing tax or legal advisory services to properly and carefully perform professional tasks assigned to Bednarz (in accordance with Article 6(1)(b) of the GDPR);
  - c) for the purpose of conducting recruitment of individuals interested in employment or cooperation with Bednarz (in accordance with Article 6(1)(c) and Article 6(1)(a) of the GDPR);
  - d) personal data may be used by Bednarz to send marketing information and offers of services that may potentially be of interest to Bednarz's clients (in accordance with Article 6(1)(f) of the GDPR); e) for the performance of contracts concluded by Bednarz with clients, including organizing training, cooperating with suppliers and other entities cooperating with Bednarz.
3. The processing of personal data is part of the process of providing services by Bednarz, while observing the principles of lawfulness, fairness, and transparency, in particular with regard to fulfilling the legal obligations incumbent on Bednarz.
4. In order to secure your personal data and ensure the high quality of services provided, we inform you that:

- a) only personal data directly sourced from our clients or their authorized representatives or proxies are subject to processing;
- b) the used data will be processed only until the final termination of cooperation with Bednarz and during the period of limitation of claims related to services provided by Bednarz as part of its activities;
- c) your personal data are not subject to profiling as one of the forms of automated processing of personal data;
- d) your personal data are not subject to commercial exchange between Bednarz and third parties;

Bednarz does not intentionally collect sensitive personal data unless such obligation arises from applicable laws, e.g., for recruitment purposes. Sensitive information includes personal data concerning racial or ethnic origin, political opinions, trade union membership, religious or philosophical beliefs, health, sexuality, sexual orientation, or the criminal record of the user, as well as genetic or biometric data.

## **2. Transfer of Personal Data to Other Entities**

1. Ordinary personal data [name, surname, workplace, official position, contact details (mailing address, phone number, email address)] may be disclosed by Bednarz to:
  - a) entities providing external services to Bednarz (including IT service providers, accountants, couriers, etc.);
  - b) public administration bodies, state authorities, and courts within the scope of their statutory activities.
2. Personal data are processed at Bednarz's registered office. Personal data are not transferred to countries outside the European Union. In the event that it is necessary to transfer personal data to third countries outside the territory of the European Union as part of the provision of services by Bednarz, Bednarz will take appropriate measures to ensure the security of the processing of your personal data.
3. Bednarz, in cooperation with its suppliers and entities providing legal, tax, and accounting advisory services, may, based on the concluded agreement, entrust the processing of personal data to the aforementioned entities in order to perform the services provided to you. However, in each case, these entities will be obliged to maintain the confidentiality of your personal data and process them in accordance with the provisions on personal data protection and the relevant instructions from Bednarz.

## **3. Confidentiality and Conditions for Personal Data Protection**

1. Bednarz declares that it has appropriate technical and organizational measures in place to ensure that the processing of entrusted personal data protects the rights of individuals whose data are processed and complies with the requirements of applicable personal data protection law, in particular Article 32 of the GDPR.
2. Bednarz declares that the processing of personal data referred to in the GDPR will be carried out under conditions that safeguard the data against unauthorized access, using the "clean desk and screen" policy, and the presence of unauthorized persons in the premises where personal data are processed is permitted only in the presence of a person authorized to process the data and under conditions ensuring the security of personal data processing.
3. Bednarz will inform you of any circumstances that may or may have an impact on the security of the entrusted personal data or its assessment, as well as on the exercise of rights by individuals whose data are processed.
4. The limitations specified in 1 -3 above do not apply to information and personal data that:

- a) are or will be made publicly available (in a manner other than through unauthorized disclosure of such information directly or indirectly by Bednarz);
- b) are or have become known to Bednarz without any confidentiality restrictions;
- c) have been or will be acquired or developed by Bednarz independently, i.e., without a breach of the confidentiality of the personal data provided by you;
- d) are disclosed at the request of a public authority if the obligation to disclose arises from the law, and Bednarz will immediately notify you of such request, provided that it is lawful.

#### **4. Personal Data Protection**

If you need more information or have any questions regarding the processing of your personal data, please contact Mateusz Bednarz directly at the email address: [mateusz.bednarz@mbednarz.pl](mailto:mateusz.bednarz@mbednarz.pl).

#### **5. Rights related to the processing of your personal data**

1. Bednarz hereby informs you of the rights you have in relation to the processing of your personal data as specified in the GDPR:
  - a) The right to request access to your personal data (including confirmation of whether they are being processed and obtaining information such as the purposes, sources, categories of data processed, and the storage period). This also includes the right to receive a free copy of your personal data (for any additional copies requested by the individual to whom the data relates, a reasonable fee may be charged to cover administrative costs).
  - b) The right to rectify or supplement personal data, which requires you to provide Bednarz with a written statement regarding the correction or supplementation of your personal data.
  - c) The right to request the erasure of personal data ("right to be forgotten"), which applies if the collected data is no longer necessary for the purposes for which it was collected, consent to its processing has been withdrawn, or there are no other legal grounds for its processing.
  - d) The right to restrict the processing of data, which applies if you contest the accuracy of the personal data for a period that allows Bednarz to verify the accuracy of such data.
  - e) The right to object to the processing of personal data, which applies based on your particular situation, provided that the legal requirements for such a request are met.
  - f) The right to data portability, including the right to receive your personal data that you have provided to us in a structured, commonly used, and machine-readable format.
  - g) The right to withdraw consent to the processing of data, where the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
  - h) The right to lodge a complaint with the supervisory authority - the President of the Office for Personal Data Protection (Stawki 2, 00-193 Warsaw) if you believe that the processing of personal data by Bednarz violates the provisions of the GDPR.

For any questions or doubts regarding the processing of your personal data, please direct them to the email address [biuro@mbednarz.pl](mailto:biuro@mbednarz.pl).

Warsaw, May 1, 2023.