

Information on the processing of personal data by Erbud S.A.

1. Who is the administrator of your personal data?

The administrator of personal data (hereinafter referred to as the "Data") processed by us in connection with running a business is ERBUD S.A. with its registered office in Warsaw at ul. Franciszka Klimczaka 1 (02-797), hereinafter referred to as the Administrator or ERBUD.

ERBUD is a member of ERBUD Capital Group. A list of all companies from Erbud Group can be found here [\[link\]](#).

The data are processed in accordance with the current regulations, including the General Regulation on the Protection of Personal Data (GDPR).¹

Any information regarding an identified or identifiable natural person is considered to be data. A person identifiable is a person whose identity can be identified directly or indirectly, in particular on the basis of an identifier such as name, identification number, location data, internet identifier or one or more specific factors determining physical, physiological, genetic, psychological, economic, cultural or social identity of a natural person.

2. How do we process the data?

ERBUD makes special care to protect the interests of people to whom the Data apply, and in particular ensures that the collected Data are:

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

3. When do we process the Data?

We process the data in many situations. These may involve the situations in which you have provided your Data in person through various communication channels (e.g. submitting your application, sending an inquiry/offer via e-mail or telephone) or as part of our cooperation when signing or executing a contract, but also when we acquired your data from other sources (e.g. from a company with which you cooperate and which is our contractor/customer).

4. Data Processing in terms of business relations and contact.

a. What Data do we process in terms of business relations and contact?

As the Administrator, we process the Data of our business partners (investors, subcontractors, contractors), their employees/co-workers, the Data of other people provided to us as part of contracts, as well as other people who contact us via telephone or email.

¹Regulation 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 the repeal of Directive 95/46/EC.

In connection with business relations and contact, we may process the following Data: Identification data, Contact details, Workplace details and professional rights, and other data provided to us in connection with cooperation or contact.

We collect the above Data directly from the data subjects as well as from other people, e.g. from their employers/customers.

b. What is the purpose and basis of the Data processing in terms of business relations and contact?

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

- establishing cooperation;
- conclusion and performance of a contract;
- settlement of contracts;
- answer any questions or requests addressed and to conduct further correspondence/contact in this regard;
- marketing and contact regarding other ERBUD information and services;
- defense against potential claims, as well as for the purpose of claim management.

The basis for the data processing by ERBUD is:

- indispensability to perform a contract or take action before conclusion a contract at the request of the data subject;
- implementation of legal obligations imposed on the Administrator;
- the 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 against potential claims.

Providing the Data is voluntary, but it may be necessary to conclude or perform a contract or to respond to a directed inquiry or to conduct correspondence.

c. How long will the Data be processed in terms of business relations and contact?

The Data collected for the purposes of the conclusion and performance of a contract will be processed for the duration of a contract, and then until the expiration of the possible claims.

The Data of people who have contacted ERBUD will be processed for the period necessary to answer and possibly conduct correspondence, and then until the expiry of the period of limitation of possible claims.

d. Who is the recipient of the Data in terms of business relations and contact?

The Data processed by us in connection with business relations and contact may be transferred to other companies from Erbud Group, to our business partners (e.g. investors and subcontractors as part of cooperation in a given project/investment) and other our partners supporting us in the organization of work, IT services and marketing.

5. Data Processing in connection with recruitment.

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

As the Administrator, we process the Data of people applying for employment provided by any available recruitment channels, in particular we process all Data provided to us as part of the application and collected as part of the recruitment process.

In connection with recruitment, we may process the following Data (processing of some Data may depend on your consent): Identification data, Contact details, Education data, Data on skills and

previous employment, Data on entitlements and other data provided to us during the recruitment process.

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

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

- consideration of the candidacy and implementation of the recruitment process, and in the case of consent, also for the purposes of future recruitment or recruitment within Erbud Group;
- defense against potential claims, as well as for the purpose of claim management.

The basis for the processing of the Data by the Administrator are the provisions of the applicable law, in particular the Labour Code and executive acts, and your consent in the range further than specified in these regulations and in the scope of future recruitment,

Providing the Data is voluntary, but necessary to carry out the recruitment process and to establish possible further cooperation.

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

The Data will be processed for the purposes set out above for the duration of the recruitment process or future recruitment, and then until the expiration of the possible claims.

c. Who is the recipient of the Data in connection with recruitment?

The Data processed by us in connection with recruitment may be transferred to other companies from Erbud Group as well as to entities supporting us in the recruitment process and providing IT services to us.

6. Are your Data transferred beyond the European Economic Area (EEA)?

Your Data are not transferred beyond the European Economic Area, and if a transfer to a place outside the EEA takes place in the future, ERBUD will take appropriate measures to ensure the Data protection, in particular by:

- the use of specific contractual clauses called "standard contractual clauses" that have been approved by the European Commission; or
- transfer to countries for which the European Commission has issued a decision stating the appropriate level of protection.

In this case, you have the right to obtain a copy of the appropriate protections.

7. What rights do you have?

Under the terms of the applicable regulations, you have the right to:

- access to the Data, including the right to obtain a copy;
- demand rectification, deletion or limitation of the Data processing;
- object to the Data processing;
- transfer the Data to another administrator (to the extent that the basis for their processing involves indispensability to perform a contract or your consent).

If the Data are processed on the basis of a consent, you will have the right to revoke it at any time without affecting the legality of the processing which was made on the basis of consent before its withdrawal.

You are also always entitled to file a complaint to the President of the Office for the Protection of Personal Data.

8. Contact:

You can contact ERBUD S.A. at the e-mail address: [] or by phone [].