

PRIVACY POLICY PRO-PROJECT Henryk Kartaszynski

The Privacy Policy PRO-PROJECT Henryk Kartaszynski is a document describing the rules, way and purpose of processing personal data collected from parties interested in the Company in order to comply with the requirements of the Regulation of the European Parliament and of the Council (EU) 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 95/56/EC (hereinafter referred to as the "GDPR" – General Data Protection Regulation).

This document also contains information for entities from whom personal data are collected about the rights belonging to them with regard to the above regulation on personal data protection.

Based on art. 13, par. 1 and 2 as well as art. 14, par. 1 and 2 of the GDPR, we inform you about the way and purpose of processing your personal data, and also about the rights belonging to you in connection with the regulation on personal data protection:

1. Who is responsible in Pro-Project for processing personal data and who is to be contacted?

The administrator of your personal data is Pro-Project Henryk Kartaszynski, based in Chelm (22-100), in Wolnosci 35/15, NIP 563-115-74-23, REGON 110005446, which can be contacted in all questions related to personal data processing as well as exercising rights connected with data processing:

- by sending mail to: 22-105 Okszów, ul. Kwiatowa 43A
- by emailing us at: contact@pro-project.pl
- by calling us at: 668 024 874; 606 161 554

2. Why does Pro-Project process your personal data and on what legal basis? What is the purpose of processing personal data?

We process your personal data in accordance with the GDPR provisions and the Polish act on personal data protection. Processing personal data will take place:

1. based on your explicit consent (art. 6, par. 1, letter i of the GDPR);
2. in order to carry out the activities executed on your request before making a contract;
3. in order to enter into and execute a contract you made with Pro-Project (art. 6, par. 1, letter b of the GDPR);
4. in order to execute a contract made with Pro-Project for you as the third party (art. 393 of the civil code) when another entity is a contracting party;

5. in order to comply with legal obligations (art. 6, par. 1, letter c of the GDPR) or to carry out jobs in public interest (art. 6, par. 1, letter e of the GDPR);
6. in order to open and administer your Pro-Control.online”, „CKJ24.PL” and „QAC24.COM” account;
7. for marketing purposes with Pro-Project products and services;
8. if you give such consent, and only within the scope you agree to, we will process your data in order to carry out the following market and opinion research: quantitative research (surveys and tests) and qualitative research (personal interviews).

When needed, we process data to protect legally justified interests of our own or third parties. Examples include the following:

- processing data of the those acting on behalf of the customers;
- ensuring IT safety;
- testing customer satisfaction;
- pursuing claims and defence against claims;
- direct marketing of products and services.

If you have given consent to have personal data processed for specific purposes (e.g. sending data under Pro-Control.online”, „CKJ24.pl”, „QAC24.COM”), Pro-Project is entitled to process such data based on this consent. Your consent may be withdrawn at any time. The withdrawing of your consent does not affect the legality of data processing before such withdrawal.

3. Who can Pro-Project transfer data to?

Personal data may be made available to other recipients in order to execute the contract with you or in order to carry out a legal obligation binding Pro-Project, based on your consent or for purposes flowing from legally justifiable interests of the administrator or a third party.

The recipients may be in particular: authorised employees, entities carrying out postal, courier, accounting, legal and IT services.

Additionally, data may be transferred to entities processing personal data on Pro-Project’s commission and to their authorised employees, with such entities processing data based on agreement with Pro-Project, exclusively as recommended by Pro-Project and on condition of confidentiality.

4. Will your personal data be sent to a third country (outside the European Union)?

Data are transferred to recipients in countries outside the European Union (“third countries”) only when necessary to carry out purposes flowing from legally justifiable interests executed by Pro-Project, if it is indispensable to carry out a contract made between you and Pro-Project or undertake actions

before entering into such a contract in order to make it, and also as part of Pro-Project's using the IT infrastructure (e.g. electronic mail).

Any other transfer of your data to a third country may take place on us obtaining your consent.

You can get a copy of personal data transferred to a third country on applying to Pro-Project's Personal Data Administrator.

5. How long will your data be processed (stored)?

Your data will be processed for a period necessary to carry out the purposes of processing shown in point 2, i.e.:

- in terms of the contract made with Pro-Project – until its completion, and after that for a period required by legal regulations or in order to perform any possible claims and servicing;
- in terms of meeting legal obligations binding Pro-Project in connection with conducting activity and executing the contracts entered into – until Pro-Project has met such obligations;
- in terms of processing carried out solely on the basis of consent – up to the moment of immediate data deletion based on your request;
- until Pro-Project has carried out legally justifiable interests on which such processing is based, or until you raise an objection against such processing, unless there is some legally justifiable basis for further data processing;
- in terms of direct marketing carried out based on consent – until consent to such processing is withdrawn.

6. What are your rights so that your personal data are adequately protected?

You have the right to:

- request access to your data, and also request to correct them, to limit their processing or to delete them;
- revoke at any time the previously given consent to have your data processed within the scope the consent was given to, without prejudice to the legality of the processing right which has been carried out based on your consent before its withdrawal;
- request that the data given by you to Pro-Project to be processed with a view to making and executing a contract, or processed based on your consent, should be transferred. The transfer consists in you receiving from Pro-Project your data in a structured, commonly used format, capable of machine reading, as well as in the right to send them to another data administrator, as long as it is technically possible. This right does not pertain to data which are the secret of the Pro-Project company;
- to lodge a complaint with a supervisory authority, which in the Republic of Poland is the President of the Personal Data Protection Office, if you should conclude that the processing of your data violates the regulations, including the GDPR.

In addition, you have the right to raise an objection at any time against Pro-Project's processing your data:

- for reasons connected with your special situation if Pro-Project processes data for purposes flowing from legally justifiable interests (art. 21 par. 1 of the GDPR);
- for purposes connected with direct marketing, including against profiling for marketing purposes, within the scope data processing is related to direct marketing (art. 21 par. 2 of the GDPR).

Pro-Project may request additional information necessary to confirm identity.

7. Am I obliged to provide personal data to Pro-Project?

In order to make it possible for Pro-Project to enter into and execute a contract, you are obliged to give your personal data. In this case, data provision is a prerequisite of making a contract.

8. The source of your personal data, meaning where does Pro-Project get your personal data from, and what are their categories?

First of all, personal data collected by Pro-Project come:

- directly from you,
- from an entity which entered into a contract with Pro-Project Henryk Kartaszyński to provide services for you,
- from a partner/distributor/third party cooperating with Pro-Project Henryk Kartaszyński, which made your personal data available based on your consent,
- from publically accessible sources, e.g. the National Court Register, Central Registry and Information about Business Activities or other similar sources.

To the extent that your data processing takes place in order to carry out the activities requested, or enter into and execute a contract with Pro-Project, data provision by you is a prerequisite of carrying out the activities requested or entering into such a contract.

Data provision is voluntary, but is indispensable to carry out the activities requested or to enter into and execute a contract with Pro-Project. Additionally, wherever applicable, in accordance with the regulations on money laundering and financing terrorism, we are particularly obliged to identify, as well as to collect and record your data.

For us to be able to fulfil those activities and obligations, the regulations require that we should be provided with the necessary information and documentation and be immediately notified about any changes. If you do not provide Pro-Project with the necessary information and documentation, Pro-Project will not be able to carry out the activities requested, enter into and execute contracts or provide services.

With regard to personal data of contractors, we obtain the said data also from other public sources, in which data about contractors are collected, i.e. the National Court Register, Central Registry and Information about Business Activities or similar sources located in other countries, as well as from private entities specializing in collecting and making available information about contractors. With personal data of people representing contractors or acting on their behalf, we obtain data both from the above-mentioned sources and from contractors themselves.

9. Security. What kind of security measures are at Pro-Project's disposal?

Pro-Project is equipped with security measures designed to protect personal data remaining under the Administrator's control against loss, illegal use or modification. Also, the Administrator possesses suitable documentation and has implemented pertinent procedures related to personal data protection in the company.

The Administrator declares that any information given is protected in accordance with the valid regulations and safety protection standards, in particular:

- a) In accordance with art. 29 of the GDPR, direct access to personal data collected by the data Administrator is granted only to authorized employees or associates of the data Administrator, as well as authorized staff servicing them to whom appropriate authorization has been granted.
- b) The Administrator declares that while contracting other entities to provide services, he requires from his partners, in accordance with directive 28 of the GDPR, that they guarantee sufficiently high protection standards of personal data entrusted to them, that they sign pertinent assignment agreements, in which the partners confirm that they apply such standards, and that they grant right to check if they act according to such standards.
- c) In order to ensure adequate protection of services provided electronically, the Service Administrator uses a high security level, including cryptographic protection of personal data transmission (the SSL protocol), in accordance with part C to the ordinance of the Minister of Internal Affairs and Administration of 29 April 2004 on personal data processing documentation, as well as technical and organizational conditions that should be complied with by the IT equipment and systems used to process personal data ((Journal of Laws 1997, no 100, item 1024).
- d) Due to a public character of the internet, using services provided electronically may involve risks, irrespective of the data Administrator exercising due diligence.

10. Cookies and links to other sites used by Pro-Project.

Some areas and functions of the Pro-Project website may use cookies, i.e. text files saved in the user's computer, identifying him in a way necessary to make some operations possible. Among other things, cookies are used to remember data needed for logging. The prerequisite of cookies working is their being accepted by the browser and their non-deletion from the disk. Deactivating cookies in most cases will limit or block some functionalities of a website.

On the Pro-Project website, third party cookies are used - Google Analytics; more information can be found on: google.com/analytics/learn/privacy.html.

11. Changing Pro-Project's Privacy Policy.

1. The Administrator reserves the right to amend the above privacy policy at any time and place, at the same time committing itself to immediately publish the new privacy policy on Pro-Project's website.
2. The Administrator reserves the right to make changes, withdraw or modify the functionalities or properties of Pro-Project's website, as well as performing any legal actions permitted by applicable laws.

12. How will Pro-Project not process personal data?

Your personal data are not subject to automated processing (e.g. profiling) with legal or similar critical effects for you, but we do use cookies and other recording systems on our websites and in the Pro-Control.online", „CKJ24.PL" and „QAC24.COM" programs (profiling for marketing purposes).

The processing of your data may be carried out in an automated and profiled way.

Your data may be profiled, especially for marketing purposes, carrying out research, estimating interests and shopping preferences, including offering and presenting advertisements, products and services based on attributed preferences, and also for internal analyses.

The following data categories will be used for profiling: information about products and services purchased, the way of using them, payment information, electronic addresses, information about devices bought and used, information contained in cookies and other systems recording movement on our websites, as well as in the Pro-Control.online", „CKJ24.PL" and „QAC24.COM" programs.

Pro-Project uses this information to evaluate Customers' preferences and interests. Thanks to these activities, we can develop a dedicated product offer and create new proposals.