

To our activity, contact with various people is of utmost importance. Establishment and maintenance of business contacts requires the collection and processing of contact data in another manner.

This information is intended for [CONTACT PERSONS](#), whose personal data we process. By "contact persons" we understand also any representatives authorized to act in the name of our clients, subcontractors, suppliers, including, for example, directors, members of the boards, commercial attorneys-in-fact, attorneys-in-fact, members of partnerships.

We provide the below information because we act in accordance with the General Data Protection Regulation (EU) 2016/679 ("[GDPR](#)").

1. Type of your personal data we process

We process your personal data, such as first name, surname, e-mail address, telephone number, work address, name of the employer, your position/title.

2. Who is the controller of your personal data?

The controller of your personal data is **Walstead Starachowice Sp. z o.o.** (ul. Bema 2c, 27-200 Starachowice, Polska). Detailed contact information is to be found on our website: <https://walstead-ce.com/en/contact-us/>. We also created a dedicated e-mail address to which you can send your queries etc. relating to matters regarding the processing of your personal data: dpo@walstead-ce.com.

3. How do we collect your personal data?

We collect your personal data in various ways. We may receive it from your employer/contractor or from employee employed by your organization. We may find it on the internet, including social media. We may receive it from you.

4. What do we need your personal data for?

We process your personal data for the following purposes:

- In order to establish cooperation with our clients, subcontractors, suppliers. We arrange the technical details of the products or services with you (e.g. technical parameters of our products, technical specifications of the equipment we purchase, schedules, price lists). It is necessary in order to conclude contracts. It is also our legitimate interest which we pursue. We do this in accordance with Article 6(1) (f) of GDPR.
- In order to indicate in a contract we wish to enter into with our client, subcontractor, supplier a person authorized to act in the name of the other party to such contract. It is necessary in order to conclude contracts. It is also our legitimate interest which we pursue. We do this in accordance with Article 6(1) (f) of GDPR.
- In order to perform contracts we concluded with our clients, subcontractors, suppliers,

including, for instance, to assess whether the contract has been performed properly, agree on modifications to the schedule. Without being able to contact you we would not be able to perform our contracts. It is our legitimate interest which we pursue. We do this in accordance with Article 6(1) (f) of GDPR.

- To perform contracts that we have concluded with clients, subcontractors, suppliers, including to assess the manner of performing the contract, to agree on changes to the schedule. Without contact with you, we would not be able to perform our contracts. This is necessary for the performance of the contract that binds us. We do this on the basis of Art. 6. sec. 1 letter (b) GDPR.
- In order to offer our products and services to our clients (direct marketing). We send you information about our new products and services or the products and services which, in our opinion, could interest your employer/contractor - our client - and to re-establish our cooperation. The desire to establish, extend or renew cooperation constitutes our legitimate interest which we pursue. We do this in accordance with Article 6(1) (f) of GDPR.

Your personal data is entered into our IT systems and stored there for easy access whenever we need it.

5. To whom do we disclose your personal data?

Not only do we process your personal data, but we also disclose it to various groups of recipients, but only when it is related to the purposes for which we process your personal data or to our use of the IT systems. We disclose your personal data e.g. to our contractors, including other companies from our Group of companies, external entities who provide services for us in the context of maintenance, repair, updating of IT systems, the couriers, carriers.

6. We use Google Cloud and other cloud computing based services. What does this mean for our processing of your personal data?

In our current activities we use Google Cloud (Gmail, Google Drive) and other cloud computing based services. This means that your personal data may be transmitted by us to third countries, i.e. outside of the EU and the EEA. While transmitting your personal data to third countries we meet the conditions described in Chapter V of RODO ("Transmission of personal data to third countries or international organizations"). In particular we use the so-called standard contractual clauses / standard data protection clauses. Detailed information on this subject is to be found on our website: <https://www.walstead-ce.com/en/home>, in the special tab related to GDPR.

7. How long do we retain your personal data?

We process your personal data as long as we can cooperate with your employer/contractor - our client, subcontractor or supplier, including as long as we can offer them our products and services. Your personal data contained in contracts we retain for 5 years from the beginning of the year following the calendar year in which transaction or proceedings have been finally completed, settled, paid or in which limitation period has ended.

8. When may you object to our processing of your personal data?

Important - Right to Object

In case of our processing of your personal data as a result of our legitimate interest, you have the **RIGHT TO OBJECT TO IT** at any time, but not in any situation. You may do so only when a special situation concerning you arises. We may also indicate important, legitimate grounds to be able to further process your personal data or to do it to assert our right or in defence.

In addition, you have the **RIGHT TO OBJECT TO** the processing of your personal data by us at any time and regardless of additional circumstances, but only if we process it for the purposes of direct marketing or profiling.

9. What other rights result for you from GDPR?

First of all, you may request us to immediately erase your personal data (thus you have the right to be forgotten). You may exercise this right in cases specified in GDPR, e.g. when we do not need your personal data any more for the purposes it was collected.

You also have the right to:

- Access your personal data, including to receive a confirmation that we process your personal data, to access it, and to receive from us particular information related to the processing of it;
- Request from us rectification of your personal data, if it is inaccurate or its completion, if your personal data is incomplete. In either of that events, we have to do so without undue delay;
- Request us to restrict the processing of your personal data in cases specified in GDPR (e.g. when you question the correctness of your personal data processed by us);
- Request from us to save your personal data in a file in a commonly available format (e.g. .docx) in a structured manner, and transmit it to a controller of your choosing (right to data portability), ,
- Submit a complaint to the President of the Office of Personal Data Protection if you think that we process your personal data against the law.

If you wish to exercise any of those rights, send us an e-mail to the e-mail address dpo@walstead-ce.com, with a content that would help us determine what your expectations are.

10. Are you obliged to disclose your personal data to us?

When you provide us with your personal data yourself, you do it voluntarily. Remember however that you may be obliged to provide us with your personal data e.g. because you are an employee of our client and contacting us is one of your work duties. By not providing us with your personal data you may be in breach of such duties.

11. Is my data subject to automated decision making or profiling?

No, your data will not be subject to profiling or other decisions that will have significant impact on you based solely on automated decision – making.