

PRIVACY POLICY
Effective as of August 24, 2021

1. DEFINITIONS

1.1. Controller – entity which defines the purposes and methods of processing personal data.

The Controller of personal data is the respective company from the S&T AG group with its registered office in Poland, which is the party to the contract for the provision or receipt of services, or the entity which was contacted.

In Poland, S&T operates through the following entities:

- S&T Services Polska Sp. z o.o. with registered office in Warsaw, ul. Postępu 21D
- S&T Poland Sp. z o.o. with registered office in Warsaw, ul. Postępu 21D.

1.2. Personal data – any information about a natural person who is identified or identifiable through one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural, or social identity of the natural person, including device IP number, location data, internet identifier, and information collected by means of cookies or a similar technology.

1.3. Policy – this Privacy Policy.

1.4. GDPR – 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.

1.5. Website – internet service provided by the Controller at www.snt.pl

1.6. User – any natural person visiting the Website or using one or more services or functionalities described in the Policy.

2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

2.1. In connection with the use of the Website by the User, the Controller shall collect data to the extent necessary to provide individual services on offer, as well as information about the User's activity on the Website. The detailed rules and purposes of processing personal data collected during the use of the Website by the User are described below.

3. PURPOSES AND LEGAL BASIS FOR DATA PROCESSING ON THE WEBSITE

USING THE WEBSITE

3.1. Personal data of all persons using the Website, including the IP address or other identifiers and information collected by means of cookies or other similar technologies, is processed by the Collector:

- 3.1.1.** To provide services involving the sharing of content collected on the Website with the Users by electronic means – in this case, the legal basis for processing is the necessity of processing for the performance of the contract (Art. 6 Section 1 Letter b of GDPR);

- 3.1.2.** For analytical and statistical purposes – in this case, the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in analyzing the User's activity and preferences in order to improve the functionalities used and services provided;
 - 3.1.3.** To determine and pursue any claims or defend thereagainst – the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in the protection of his rights;
 - 3.1.4.** For marketing purposes of the Controller and other entities, especially in connection with behavioral advertising – rules for processing personal data for marketing purposes are described in the MARKETING section.
- 3.2.** User's activity on the Website, including his or her personal data, is recorded in system logs (a special computer program used to store a chronological register of information about events and activities concerning the IT system used by the Controller to provide services). Information collected in the logs is processed primarily for purposes related to the provision of services. The Controller also processes data for technical and administrative purposes to ensure the security of the IT system and management thereof, as well as for analytical and statistical purposes – in which case the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR).

REGISTRATION FOR TRAINING

- 3.3.** Registration for training through the Website involves the processing of the Website User's personal data. Providing data marked in the form as mandatory is required to receive and process the registration for training, while failure to provide it results in the inability to perform the service. Providing other data is optional.
- 3.4.** Personal data is processed:
 - 3.4.1.** To fulfill a placed order – the legal basis for processing is the necessity of processing for the performance of the contract (Art. 6 Section 1 Letter b of GDPR); within the scope of data provided optionally, the legal basis is consent (Art. 6 Section 1 Letter a of GDPR);
 - 3.4.2.** To comply with the legal obligations to which the Controller is subject, especially resulting from tax and accounting legislation – the legal basis for processing is the legal obligation (Art. 6 Section 1 Letter c of GDPR);
 - 3.4.3.** For analytical and statistical purposes – the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in analyzing the Users' activity on the Website;
 - 3.4.4.** To determine and pursue any claims or defend thereagainst – the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in the protection of his rights.

CONTACT FORMS

- 3.5.** The Controller provides the opportunity to contact him by means of electronic contact forms on the Controller's websites. Using a form requires providing personal data necessary to establish

contact with the User and reply to the inquiry. The User may also provide other data to facilitate contact and processing of the inquiry. Providing data marked as mandatory is required to receive and process the inquiry, while failure to provide it results in the inability to process it. Providing other data is optional.

3.6. Personal data is processed:

3.6.1. To identify the sender and process his or her inquiry sent via the provided form – the legal basis is the necessity of processing for the performance of the contract for the provision of the service (Art. 6 Section 1 Letter b of GDPR); within the scope of data provided optionally, the legal basis is consent (Art. 6 Section 1 Letter a of GDPR);

3.6.2. For analytical and statistical purposes – the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in maintaining statistics of inquiries submitted by Users via the Website in order to improve its functionalities;

TELEPHONE CONTACT

3.7. In the case of contacting the Controller by telephone, in matters not related to the contract concluded or services provided, the Controller may request personal data only if this is necessary to handle the issue to which the contact pertains.

3.8. In this case, the legal basis is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in the necessity to solve a reported issue related to the conducted business activity.

CORRESPONDENCE

3.9. In the case of directing conventional or electronic (e-mail) correspondence to the Controller which is unrelated to the services provided to the sender or any other contract concluded with him or her, personal data contained in such correspondence is processed only for the purposes of communication and solving the issue to which the correspondence pertains.

3.10. The legal basis for data processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in keeping correspondence addressed to the Controller in relation to his business activities.

3.11. The Controller only processes data pertinent to the issue to which the correspondence is related. All correspondence is stored in a way ensuring security of personal data and other information contained within and disclosing it to authorized persons only.

COLLECTING PERSONAL DATA AS PART OF BUSINESS CONTACTS

3.12. In connection with his business activities, the Controller also collects personal data in other situations, such as during business meetings or through the exchange of business cards – to initiate and maintain business contacts.

3.13. In this situation, the legal basis for data processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in establishing a network of contacts in connection with the conducted business activities.

4. MARKETING

- 4.1.** The Controller processes Users' personal data to conduct marketing activities which may consist of:
- 4.1.1.** Displaying marketing content to the User which is not adapted to his or her preferences (contextual advertising);
 - 4.1.2.** Displaying marketing content to the User which is tailored to his or her interests (behavioral advertising);
 - 4.1.3.** Directing e-mail notifications about interesting offers or content which in some cases contain commercial information (Newsletter service);
 - 4.1.4.** Conducting other types of activities related to direct marketing of goods and services (sending commercial information by electronic means)
- 4.2.** To carry out marketing activities, the Controller sometimes uses profiling. This means that by means of automatic data processing, the Controller evaluates selected factors concerning the Users to analyze their behavior and create a forecast for the future. This allows the content displayed to be better tailored to the User's individual preferences and interests.

CONTEXTUAL ADVERTISING

- 4.3.** The Controller processes Users' personal data for marketing purposes in connection with targeting contextual advertising at them (i.e. advertising which is not tailored to the User's preferences). In such cases, personal data is processed in connection with furthering the Controller's legitimate interest (Art. 6 Section 1 Letter f of GDPR).

BEHAVIORAL ADVERTISING

- 4.4.** The Controller and his trusted partners process Users' personal data, including personal data collected through cookies and similar technologies, for marketing purposes in connection with targeting behavioral advertising at them (i.e. advertising which is tailored to the User's preferences). In such cases, processing personal data also involves User profiling.

- 4.5.** List of the Controller's trusted partners:

<https://www.salesmanago.pl/>,

<https://www.sunrisesystem.pl/>

NEWSLETTER

- 4.6.** The Controller provides the Newsletter to persons who have consented to receive it by e-mail. Providing data is required to provide the Newsletter service, while failure to do so results in the inability to send it. This form of communication with the User may involve profiling.
- 4.7.** Personal data is processed:
- 4.7.1.** In the case of directing marketing content to the User as part of the Newsletter – the legal

basis for processing, including profiling, is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) provided that consent is given to send commercial information by electronic means;

4.7.2. For analytical and statistical purposes – the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in analyzing the User's activity on the Website to improve the functionalities in use;

4.7.3. To determine and pursue any claims or defend thereagainst – the legal basis for processing is the legitimate interest of the Controller (Art. 6 Section 1 Letter f of GDPR) consisting in the protection of his rights;

DIRECT MARKETING

4.8. The User's personal data may also be used by the Controller to direct marketing content to the User through various channels, including but not limited to e-mail. Such actions are taken by the Controller only if the User has given consent, which he or she can withdraw at any time.

4.9. In some cases, the Controller may also perform direct marketing activities through conventional mail. The User shall be notified separately about the intention to do so, and he or she has the right to object to this type of marketing.

5. SOCIAL MEDIA PROFILES

5.1. The Controller maintains public profiles on the Facebook and LinkedIn social media platforms and, in relation to this, he processes the personal data of Users visiting these profiles, including comments, likes, and internet identifiers.

5.2. Users' personal data is processed:

5.2.1. To enable the Users to be active on the profiles;

5.2.2. To maintain the profiles by informing the Users about the Controller's initiatives and his activities, in particular the promotion of various events, services, or products;

5.2.3. For statistical and analytical purposes;

5.2.4. Data can be processed to pursue any claims and defend thereagainst;

5.3. The legal basis for processing personal data by the Controller is his legitimate interest (Art. 6 Section 1 Letter f of GDPR) consisting in promoting his brand and improving the quality of provided services, and if necessary – the legitimate interest consisting in promoting claims and defending thereagainst.

5.4. The above-mentioned information does not apply to the processing of personal data by the administrators of Facebook and LinkedIn, respectively.

6. COOKIES

6.1. Cookies are small text files installed on the device of the User browsing the Website. Cookies collect information facilitating the use of the website – for example, by tracking the User's visits to

the website and his activities on it.

"WEBSITE" COOKIES

6.2. The Controller uses the so-called website cookies primarily to provide the User with services provided by electronic means and to improve the quality of such services. Therefore, the Controller and other entities providing analytical and statistical services on behalf of the Controller use cookies to store information or gain access to information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). Cookies used for this purpose include:

- 6.2.1.** Cookies with data input by the User (session identifier) for the duration of the session (user input cookies);
- 6.2.2.** Authentication cookies used for services which require authentication for the duration of the session (authentication cookies);
- 6.2.3.** Cookies used to ensure security, such as those used to detect authentication irregularities (user-centric security cookies);
- 6.2.4.** Session cookies of multimedia players (e.g. flash player cookies) for the duration of the session (multimedia player session cookies);
- 6.2.5.** Permanent cookies used to personalize the user interface for the duration of the session or for a while longer (user interface customization cookies);

"MARKETING" COOKIES

6.3. The Controller and his trusted partners also use cookies for marketing purposes, e.g. in connection with targeting behavioral advertising at the Users. For this purpose, the Controller and his trusted partners store information and gain access to information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.).

7. ANALYTICAL AND MARKETING TOOLS

7.1. The Controller and his partners utilize various solutions and tools used for analytical and marketing purposes. Below is some basic information about these tools. Detailed information on this topic can be found in the privacy policy of the respective partner.

GOOGLE ANALYTICS

7.2. Google Analytics cookies are files used by Google to analyze the way the User utilizes the Website to produce statistics and reports pertaining to the functioning of the Website. Google does not use the collected data to identify the User nor does it link such information to enable identification. Detailed information on the scope and rules of data collection in connection with this service can be found under the following link:

<https://www.google.com/intl/pl/policies/privacy/partners>.

FACEBOOK PIXELS

- 7.3.** Facebook Pixels is a tool which allows measuring the effectiveness of advertising campaigns conducted by the Controller on Facebook. This tool enables advanced data analytics to optimize the Controller's activities combined with the use of other tools offered by Facebook. Detailed information concerning data processing by Facebook can be found at:

https://pl-pl.facebook.com/help/443357099140264?helpref=about_content.

GOOGLE ADWORDS

- 7.4.** Google Adwords is a tool that enables measuring the effectiveness of advertising campaigns conducted by the Controller, allowing for the analysis of data such as keywords or the number of unique users. The Google Adwords platform also allows us to display our advertisements to users who have visited the Website in the past. Information about data processing by Google within the scope of the above-described service is available under the following link:

<https://policies.google.com/technologies/ads?hl=pl>.

LINKEDIN ADVERTISING

- 7.5.** Sales Navigator is a tool which allows measuring of effectiveness of advertising campaigns conducted by the Controller on LinkedIn. This tool enables advanced data analytics to optimize the Controller's activities combined with the use of other tools offered by LinkedIn.

SOCIAL PLUGINS

- 7.6.** The Website uses plugins of social networking portals (Facebook, YouTube, LinkedIn, Twitter). Plugins allow the User to share content published on the Website on the selected social networking portal. Through the use of the plugins on the Website, the respective social networking portal receives information about the use of the Website by the User and may assign it to the User profile created on the respective portal. The Controller does not possess knowledge about the purpose or scope of data collection by the social networking portals. Detailed information on this topic can be found under the following links:

7.6.1. Facebook: <https://www.facebook.com/policy.php>

7.6.2. YouTube: <https://policies.google.com/privacy?hl=pl&gl=pl>

7.6.3. LinkedIn: https://www.linkedin.com/legal/privacy-policy?_l=pl_PL

7.6.4. Twitter: <https://twitter.com/en/privacy>

8. MANAGING COOKIE SETTINGS

- 8.1.** The use of cookies to collect data, including gaining access to data stored on the User's device, requires the User's consent. Such consent may be withdrawn at any time.
- 8.2.** Permission is not required only for cookies the use of which is required to perform a telecommunications service (data transmission to display content).
- 8.3.** Consent to the use of cookies can be withdrawn by using web browser settings. Detailed

information about this topic can be found under the following links:

8.3.1. Internet Explorer:

<https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

8.3.2. Mozilla FireFox:

<http://support.mozilla.org/pl/kb/ciasteczka>

8.3.3. Google Chrome:

<http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>

8.3.4. Opera:

<http://help.opera.com/Windows/12.10/pl/cookies.html>

8.3.5. Safari:

<https://support.apple.com/kb/PH5042?locale=en-GB>

8.4. At any time, the User may verify the status of the current privacy settings for the browser in use by utilizing the tools available under the following links:

8.4.1. <http://www.youronlinechoices.com/pl/twojewyborzy>

8.4.2. <http://optout.aboutads.info/?c=2&lang=EN>

9. PERIOD OF PROCESSING PERSONAL DATA

9.1. The period of data processing by the Controller depends on the type of service provided and the purpose for processing. The period of data processing may also result from legal provisions if they constitute the basis for processing. If the basis for processing is the necessity to conclude and perform a contract, data shall be processed throughout the period of performing the service or fulfilling the order. If processing is based on consent, data shall be processed until the consent is withdrawn. In the case of data processing based on the legitimate interest of the Controller – data shall be processed for a period sufficient to fulfill this interest or raise an effective objection against the data processing.

9.2. The period of data processing may be extended if processing is required to determine and pursue any potential claims or to defend against any claims, and thereafter only in cases and to the extent required by law. After the expiry of the processing period, data is irretrievably deleted or anonymized.

10. USER'S RIGHTS

10.1. The User has the right of access to the data content, to request its rectification, erasure, restriction of processing, the right to data portability, and the right to object to data processing, as well as the right to lodge a complaint with the supervisory authority responsible for the protection of personal data in Poland.

- 10.2.** To the extent that the User's personal data is processed based on consent, it may be withdrawn at any time by contacting the Controller.
- 10.3.** The User has a right to object to data processing for marketing purposes if the processing takes place in connection with the legitimate interest of the Controller, and also for reasons related to the User's particular situation – in other cases where the legal grounds for data processing is the legitimate interest of the Controller (e.g. in connection with pursuing analytical and statistical objectives).

SUBMITTING REQUESTS RELATED TO THE EXERCISE OF RIGHTS

- 10.4.** Requests related to the exercise of data subjects' rights may be submitted in written form to the Controller's address: 02-676 Warsaw, ul. Postępu 21D, or by e-mail to the following address: RODO@snt.pl.
- 10.5.** If the Controller is unable to identify a natural person based on a submitted request, he shall ask the submitter for additional information. Providing such data is not mandatory, but failure to do so will result in the refusal to fulfill the request.
- 10.6.** The reply to the request shall be given without delay, but no later than within one month from receiving the submission. In duly justified situations, the time limit for reply may be extended, and the Controller shall inform the Submitter of this fact.
- 10.7.** The Controller stores information pertaining to the submitted request and the person who submitted it to ensure the ability to demonstrate compliance and to determine, defend, or pursue any data subjects' claims. A register of data subjects' requests is stored in a way ensuring integrity and confidentiality of data contained within.

11. DATA RECIPIENTS

- 11.1.** In connection with the performance of services, personal data shall be disclosed to third parties, including in particular suppliers responsible for maintaining IT systems, entities providing accounting, HR, and payroll services, delivery companies (in connection with fulfilling the order), marketing agencies (within the scope of marketing services), and entities related to the Controller, including companies of his capital group.
- 11.2.** If the User's consent has been granted, his or her data may also be shared with other entities for their own purposes, including for marketing reasons.
- 11.3.** The Controller reserves the right to disclose selected information concerning the User to competent authorities or third parties which submit a request to provide such information based on a relevant legal basis and in accordance with the provisions of law in force.

12. DATA TRANSFER OUTSIDE THE EEA

- 12.1.** The level of protection of personal data outside the European Economic Area (EEA) differs from the European law. Therefore, the Controller transfers personal data outside the EEA only when necessary and ensuring an appropriate level of protection, in particular by:
 - 12.1.1.** Cooperating with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued regarding the determination

of ensuring an adequate level of data protection;

12.1.2. Using standard contractual clauses issued by the European Commission;

12.1.3. Applying binding corporate rules approved by the competent supervisory authority;

12.2. The Controller shall always inform about the intention to transfer personal data outside the EEA at the stage of its collection. Page | 10

13. SECURITY OF PERSONAL DATA

13.1. The Controller shall conduct an on-going risk analysis to ensure that he processes personal data in a secure manner – ensuring, in particular, that data can only be accessed by authorized persons and only to the extent necessary to perform their tasks. The Controller makes sure that all operations on personal data are registered and made only by authorized employees and cooperating entities.

13.2. The Controller undertakes all necessary actions to ensure that subcontractors and other cooperating entities guarantee appropriate security measures whenever they process personal data on behalf of the Controller.

14. INFORMATION CLAUSES

14.1. For more information about the rules for processing personal data and rights arising from GDPR, see the informational clauses for specific data subjects' groups:

14.1.1. [Guests in the S&T office in Park Postępu](#)

14.1.2. [Contractors' personnel](#)

14.1.3. [Candidates in the recruitment process](#)

14.1.4. [Subcontractors who are natural persons](#)

14.1.5. [Subcontractors' personnel](#)

14.1.6. [Persons contacting the Service Desk](#)

15. CONTACT DETAILS

15.1. The Controller can be contacted by e-mail at RODO@snt.pl or by conventional mail at the correspondence address: ul. Postępu 21D, 02-676 Warsaw.

15.2. The Controller has appointed a Management Board Representative for the Personal Data Protection who can be contacted by e-mail at the Controller's address or at RODO@snt.pl, about any matter pertaining to the processing of personal data.

16. AMENDMENTS TO THE PRIVACY POLICY

16.1. This policy is verified on a regular basis and updated as required.