

## Privacy Notice

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 the **GDPR**) comes into effect on 25 May 2018.

This Privacy Notice shows the principles of personal data processing by PATH Law Hatylak Kielian i Wspólnicy sp.k and your rights with relation to the data.

The Controller of your personal data is **PATH Law Hatylak Kielian i Wspólnicy sp.k** (hereinafter referred to as PATH), with its registered office in Warsaw (00-014), at ul. Moniuszki 1A, entered in the National Court Register under number 0000596058.

website: [www.pathlaw.pl](http://www.pathlaw.pl)

email address: [kancelaria@pathlaw.pl](mailto:kancelaria@pathlaw.pl)

telephone number +48 22212 04 50

The supervisory authority with respect to personal data in Poland is currently the Inspector General for the Protection of Personal Data (GIODO): [www.giodo.gov.pl](http://www.giodo.gov.pl)

### 1. What rights do you have in relation to the processing of personal data?

You are vested with the following rights under the GDPR:

- the right to access the content of your personal data stored by us and rectify the same if it is inaccurate or untrue,
- the right to erase or restrict the processing of your personal data,
- the right to obtain a copy of, or to transfer, personal data (to receive the personal data provided to us in an accessible format for the purpose of transferring such data to another controller),
- the right to object to the processing of personal data,
- the right not to be subject to automated decision-making, including profiling.

Please note that these rights are not absolute and we may be entitled to reject requests if there are exemptions.

If you are dissatisfied with the way in which we process personal data, you can lodge a complaint at the website [www.giodo.gov.pl](http://www.giodo.gov.pl)

### 2. Categories of personal data collected

PATH collects personal data *sensu largo*, from which a natural person can be identified, including without limitation:

- the name and contact information, such as the residential or business address, telephone number and email address,
- biographical information to confirm your identity, such as date of birth, PESEL, tax identification number, ID card number, passport number, nationality and country of residence,
- information on employment, education, family or personal circumstances,
- your objectives related to the use of our services,
- information to meet the requirements of anti-money laundering legislation, restrictions on doing business by public officials, etc.,
- financial data or data related to the provision of services concerned, *inter alia*, data relating to your property and financial situation or that of the persons to whom the given activity relates, data related to your economic, professional or social activity.

PATH may process other personal data provided by you which is not placed on the above list, provided that the processing is performed in order to fulfil an agreement which has been concluded.

### **3. Methods of collecting personal data**

PATH collects your data in a number of ways, including:

- on the basis of information provided at meetings and under legal and tax advisory agreements concluded with us,
- during contacts by telephone, fax, letter, e-mail and other forms of electronic communication,
- based on information provided through your company or agent,
- from our advisors, agents and administrators of your assets,
- when you complete (personally or through us) any other documentation,
- from publicly available sources or from third parties when it is necessary to verify information obtained about you.

### **4. Grounds for processing personal data (other than consent)**

1. We process your personal data in order to perform an agreement to which you are a party or in order to take necessary actions on your behalf before signing the agreement. In this respect, we use your data to contact you by telephone and electronically, to prepare an offer presenting our services, to provide services in accordance with the provisions of the agreement or on other terms as may be agreed from time to time.
2. We process your personal data when it is necessary for the legitimate interests of PATH, in particular for the administration and management of our business, collection of payments when due, training of employees or monitoring of their performance, consultation of our rights and obligations, e.g. when we need legal advice.
3. We also process your personal data in order to comply with the legal obligations to which we are subject. In this regard, we use personal information to fulfil compliance

requirements and regulatory obligations, such as anti-money laundering laws, requirements of tax authorities, any competent courts or public administration authorities. We also process your data for tax and accounting purposes.

#### **5. Who we make your personal data available to**

When processing your data for the purpose of performing an agreement we have concluded and to protect the legitimate interests pursued by PATH, as well as pursuant to the provisions of law, we make the data available in particular to:

- third parties who we employ to assist us in the provision of services, regardless of the type of contract or form of cooperation, acting for and on behalf of PATH,
- our professional advisers, if their advice or assistance is necessary, including without limitation translators, accountants, IT specialists, PR specialists,
- entities and authorities to whom a transfer of data is necessary for the performance of a specific activity or service,
- state and local government entities and authorities which are authorised to review the data under the provisions of law,
- common and administrative courts, to which personal data is disclosed in connection with the performance of an agreement concluded with the client,
- entities and authorities which are clearing houses or other entities carrying out clearing or settlement transactions, to institutions or bodies which represent them,
- entities and authorities that maintain databases in connection with a creditworthiness or risk assessment study or assist us in verifying information about you,
- entities and authorities to whom personal data may be transferred on the basis of your consent or authorisation,
- other third parties, such as agents, whom we make known to you,
- our providers of courier/delivery, warehousing and data destruction services.

#### **6. Transferring and processing of personal data outside the European Union**

Making personal data available to third parties in the manner specified in this Privacy Notice may involve transferring the same outside the European Union.

In such cases, the personal data will be transferred only subject to one of the following conditions:

- the country to which we transfer the personal data has been approved by the European Commission as one that ensures an adequate level of protection of personal data,
- the personal data is transferred to a recipient in the United States of America which is registered with the EU-US Privacy Shield; or
- you have expressly agreed to this.

## **7. Retention of data - personal data storage period**

PATH undertakes to take appropriate security measures, both technical and organisational, to protect your personal data. PATH, as the Controller of your personal data, will process your data only for the period during which it is legally obliged to do so and will erase them when it is no longer useful or it turns out that the purpose to be achieved no longer requires the processing of such data, however, no longer than until the expiry of time-bar periods related to the agreement or a time-bar to the obligations arising from the law.

This document is for information purposes and does not have to be signed by you for approval.

**Kancelaria PATH Law Hatylak Kielian i Wspólnicy sp.k**