PRIVACY POLICY

(last updated: March 21, 2023)

General Provisions

- 1. This document constitutes the privacy policy of Cyfrowe Centrum Serwisowe S.A.
- 2. We process the data of various individuals clients, contractors, employees, or job applicants.
- **3.** This privacy policy presents the general principles regarding data processing by Cyfrowe Centrum Serwisowe S.A.
- **4.** Detailed rules of personal data processing are contained in separate documents in the form of information on the processing of personal data by Cyfrowe Centrum Serwisowe S.A. We encourage you to review them.

5. Definitions:

CCS – means the company Cyfrowe Centrum Serwisowe S.A. with its registered office in Piaseczno, address: ul. Puławska 40A, Piaseczno (postal code: 05-500), entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, under KRS number 0000253995, NIP 951-19-78-674, with a share capital of PLN 1,589,100, BDO Registration Number: 000042506, e-mail address: info@ccsonline.pl;

personal data – means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person;

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 (General Data Protection Regulation).

data subject – any natural person whose personal data are processed by CCS.

Data Processing

- **6.** In connection with its business activity, CCS collects and processes personal data in accordance with applicable laws, in particular with the GDPR and the principles of data processing provided therein.
- 7. CCS collects personal data for specific, explicit, and legitimate purposes.
- 8. CCS processes personal data lawfully, fairly, and in a transparent manner for the data subject.
- **9.** CCS processes personal data in a manner ensuring adequate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

- 10. You may contact CCS, including the Data Protection Officer, via:
- a) the address: Cyfrowe Centrum Serwisowe S.A., ul. Puławska 40A, 05-500 Piaseczno;
- b) e-mail: info@ccsonline.pl;
- c) the contact form available on the website at https://www.ccsonline.pl/;
- d) phone: +48 22 726 38 10.

Personal Data Security

- **11.** To ensure data integrity and confidentiality, CCS applies procedures that allow access to personal data only to authorized persons and only to the extent necessary for the performance of their tasks.
- **12.** CCS applies technical and organizational measures necessary to ensure that all operations on personal data are recorded and carried out only by authorized persons.
- **13.** Taking into account the state of technical knowledge, the cost of implementation, and the nature, scope, context, and purposes of processing as well as the risk of violation of the rights or freedoms of natural persons with varying probability and severity, CCS implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk.
- **14.** CCS also takes all necessary steps to ensure that cooperating entities provide an appropriate level of security whenever they process personal data on behalf of CCS.
- **15.** CCS strives to ensure that the personal data processed are adequate, relevant, and limited to what is necessary for the purposes for which they are processed.

Data Retention

- **16.** CCS stores personal data in a form enabling the identification of the data subject for no longer than is necessary for the purposes for which the data are processed;
- 17. Retention periods for personal data vary depending on the purpose for which they were collected.
- **18.** The processing period may also result from legal provisions, if they constitute the basis for processing.
- **19.** In the case of processing based on CCS's legitimate interest, the data are processed for a period enabling its realization or until an effective objection to processing is raised.
- **20.** The processing period may be extended if processing is necessary to establish, exercise, or defend against potential claims, and thereafter, only if and to the extent required by law.

Access to Personal Data

21. CCS entrusts, shares, or transfers personal data only in accordance with applicable laws, in particular with the GDPR, and the principles of data processing provided therein.

Transfer of Data Outside the European Economic Area (EEA)

22. CCS may transfer personal data outside the European Union / European Economic Area or to an international organization, subject to the requirements provided by the GDPR.

Data Processing Methods

- **23.** CCS may process personal data both traditionally and in an IT environment. Below we present key cases of personal data processing by CCS.
- 24. We indicate that in connection with the use of websites at the following addresses:
- a) https://www.ccsonline.pl/;
- b) https://ccsonline.biz.pl/;
- c) https://sklep.ccsonline.pl/;
- d) https://sklep.ccsonline.biz.pl/;
- e) https://karyon.pl;

we may process personal data.

- **25.** Furthermore, we indicate that CCS may process personal data in particular in connection with:
- a) performance of warranty repairs of devices;
- b) performance of paid device inspection services;
- c) performance of paid device repair services;
- d) performance of device disposal;
- e) purchases in CCS online stores at the following addresses:
- (i) https://www.ccsonline.pl/;
- (ii) https://ccsonline.biz.pl/;
- (iii) https://sklep.ccsonline.pl/;
- (iv) https://sklep.ccsonline.biz.pl/;
- (v) https://karyon.pl;
- f) purchases from CCS in a manner other than through CCS online stores;
- g) use of a customer account in CCS online stores;
- h) use of forms provided by CCS.
- **26.** It is possible to order commercial information delivered electronically from CCS. In order to provide such commercial information, we will process personal data.
- 27. We may also process data for the purpose of handling complaints.
- **28.** Our business requires cooperation with many suppliers and subcontractors. This may involve data processing for the purpose of establishing and performing such relationships.
- 29. CCS may conduct recruitment processes. Personal data are processed in the course of recruitment.

We make every effort to ensure that the privacy policy contains up-to-date information. We strive to update this privacy policy on an ongoing basis.