

Personal data processing policy of BOHAMET S.A.

At BOHAMET S.A we attach importance to protecting personal data regarding our employees, counterparts, and other persons in contact with us. We have therefore created this document which will allow you to familiarise yourself with information about how your personal data is being processed, in accordance with the provisions of the 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, OJ UE L 119, 4.5.2016) – hereinafter referred to as: “**GDPR**”.

Considering the above we developed several versions of the Privacy Notice – one for each of the categories of persons, for ease of use and comprehension. Thus, we encourage you to read the appropriate Privacy Notice applicable to you. Please choose one of the following links:

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BOHAMET S.A.

Ciele, ul. Toruńska 2, 86-005 Białe Błota

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Tel: (+48) 52 32 03 900

Fax: (+48) 52 32 03 901

E-mail: sekretariat@bohamet.pl

Privacy Notice for prospective employees of BOHAMET S.A. headquartered in Ciele

This Privacy Notice regards persons who are interested in undertaking employment at BOHAMET S.A., who intend to submit or have already submitted their application documents, such as CVs or cover letters, or who are already undergoing the recruitment process, e.g. have been invited to a job interview.

Pursuant to the 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, OJ UE L 119, 4.5.2016) – hereinafter referred to as: “**GDPR**”, we inform that:

1. The controller of your personal data is **BOHAMET S.A. headquartered in Ciele**, ul. Toruńska 286-005 Ciele, Białe Błota, registered in the National Court Register maintained by the District Court in Bydgoszcz, Commercial Division No. 13 of the National Court Register no 0000471258, business ID no (NIP): 5540384828, share capital of PLN 36,000,000, paid in full.
2. You can contact the controller by post at the above address, by phone at +48 52 3203900, or by e-mail: sekretariat@bohамет.pl
3. Your personal data is processed on the legal basis of:
 - a. where the data processing regards personal data described in the provisions of the Polish Labour Code, the legal basis for its processing is Article 6(1)(b) of GDPR which states that personal data processing is permitted, inter alia, in cases where such processing is necessary to undertake action requested by the data subject before concluding an agreement. We call attention to the contents of Article 22¹ Sections 1 and 2 of the 26.06.1974 labour code act, which reads: “*the employer requires from the prospective employee the following personal data: 1) first and second names and last name; 2) date of birth; 3) contact details provided by the person; 4) education information; 5) professional qualifications information; 6) employment history*”, with the reservation that providing the data described in points 4)-6) is mandatory only whenever it is necessary to undertake work of given type or in a given position. This is the specific data being processed based on the abovementioned GDPR provision,
 - b. where the data being processed is different from the data described above and is enclosed in the CV or other recruitment documents (such as a personal portrayal, interests, etc.), the legal basis for processing such data is your consent, pursuant to Article 6(1)(a) of GDPR which states that data processing is permitted in cases where the data subject has given consent for processing of their personal data for one or more specific purposes. Importantly, provision of such data (i.e. data other than that described in the labour code) is voluntary and contingent on your decision.
4. Independently of the above, should you express consent for the processing of your personal data not only for the purposes of the current recruitment processes, but also for the purposes of the future recruitment processes at BOHAMET S.A., such consent being entirely voluntary and dependent of your will, this processing of personal data shall rely on the legal basis of Article 6(1)(a) of GDPR which states that which states that data processing is permitted in cases where the data subject has given consent for processing of their personal data for one or more specific purposes.
5. Your personal data shall be stored for the period of the recruitment process in which you are participating. Where consent has been given for data processing for the purposes of future

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recruitment processes, we will be processing the data for 12 months from the moment of submission of the recruitment documents, after which period we will erase the data.

6. The recipients of your personal data may be:
 - a. entities operating the websites where BOHAMET S.A. posts job advertisements, such as pracuj.pl, praca.pl, or olx.pl,
 - b. entities providing IT support services to BOHAMET S.A.
7. By provisions of GDPR you have the right to request access to your data from the controller, the right to request rectification or erasure of your data, the right to restrict its processing, the right to object to it being processed, the right to request transferring the data and the right to withdraw your consent at any time. The withdrawal of consent does not have any effect on lawfulness of data processing that occurred prior to the withdrawal.
8. Should you conclude that the processing of your personal data violates the provisions of GDPR, you have the right to lodge a complaint with a supervisory entity - the President of The Office for Protection of Personal Data.
9. The provision of personal data specified in the provisions of the labour code may be a prerequisite to participate in the recruitment process. Provision of other personal data is voluntary.
10. In the processing of your data the controller does not utilise automated decision-making (e.g. artificial intelligence) or profiling in the meaning of GDPR.
11. Your personal data is not shared with a third country or an international organisation.

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Privacy Notice for Prospective Customers/Counterparts of BOHAMET S.A. headquartered in Ciele

This Privacy Notice regards any persons who are interested in buying products of BOHAMET S.A. or using our services, who are offering us their products or services as suppliers or providers, who conduct trade negotiations with BOHAMET S.A., intend to enter into a contract with BOHAMET S.A., or who hold other talks regarding establishing economic cooperation with BOHAMET S.A.

Pursuant to the 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, OJ UE L 119, 4.5.2016) – hereinafter referred to as: “**GDPR**”, we inform that:

1. The controller of your personal data is **BOHAMET S.A. headquartered in Ciele**, ul. Toruńska 286-005 Ciele, Białe Błota, registered in the National Court Register maintained by the District Court in Bydgoszcz, Commercial Division No. 13 of the National Court Register no 0000471258, business ID no (NIP): 5540384828, share capital of PLN 36,000,000, paid in full.
2. You can contact the controller by post at the above address, by phone at +48 52 3203900, or by e-mail: sekretariat@bohамет.pl
3. Personal data of prospective customers and counterparts is processed for the purposes of establishing trade relations between BOHAMET S.A. and its counterparts, in particular for the purpose of selling products and services offered by BOHAMET S.A. or for purchasing products from external suppliers or services from subcontractors or other third-party entities. If it was you who contacted BOHAMET S.A. with the proposal of establishing a trade cooperation or entering into a contract, the legal basis for processing your personal data is the necessity of its processing in order to take steps at the request of the data subject prior to entering into a contract, pursuant to Article 6(1)(b) of GDPR. If it was BOHAMET S.A. who has contacted you with a proposal of entering into a contract, the legal basis for processing of your personal data is the necessity of its processing for the purposes of the legitimate interests pursued by the controller, those being offering to establish trade relations with BOHAMET S.A. to prospective counterparts, including offering to sell its products or services or to sell products or services of other entities, pursuant to Article 6(1)(f) of GDPR.
4. Provision of personal data may be a prerequisite to making the offer and conducting trade negotiations. Consequently, a refusal to provide personal data may result in inability to hold trade talks and negotiations, and an inability to establish trade relations.
5. Where personal data is being processed for the purpose of entering into a contract or establishing trade relations, we shall process your data for the period of negotiations and talks regarding the contract at hand. Should the contract fail to be concluded and trade relations fail to be established, we shall erase your data immediately after the relevant talks are terminated. Should the contract be concluded, we shall process your data for the term of the contract and after it expires – until the expiry of the limitation period regarding claims arising from that contract, including tax claims. Detailed information regarding the processing of personal data of a counterparty after entering into a contract can be found in the Privacy Notice for counterparts.
6. The recipients of your personal data may be:
 - a. entities providing IT support service to the Controller,
 - b. legal and advisory service providers (in particular law firms, tax advisors),

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- c. entities providing postal and courier services.
- 7. You have the right to access your personal data, the right to request rectification or erasure of your data, and the right to restrict its processing. Where your data is being processed out of necessity for the purpose of entering into a contract, you have the right to request transfer of your personal data. Where your data is being processed out of necessity for the purpose of pursuing legitimate interests of the data controller, you have the right to object to it being processed.
- 8. Should you conclude that the processing of your personal data violates the provisions of GDPR, you have the right to lodge a complaint with a supervisory entity - the President of The Office for Protection of Personal Data.
- 9. Your personal data is not shared with a third country or an international organisation.
- 10. In the processing of your data the controller does not utilise automated decision-making (e.g. artificial intelligence) or profiling in the meaning of GDPR.

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Privacy Notice for employees of the prospective Customers/Counterparts of BOHAMET S.A. headquartered in Ciele

This Privacy Notice regards employees and associates of the economic entities (e.g. companies, businesses, etc.) who contact us on behalf of their employers/principals. Therefore, if you are a person responsible for contacting BOHAMET S.A. as a prospective customer or counterpart, e.g. for the purpose of purchasing products or services from BOHAMET S.A., or of offering products or services of your employer as a supplier or a provider for the benefit of BOHAMET S.A., or of conducting trade negotiations with BOHAMET S.A., or in cases where your employer intends to enter into contract with BOHAMET S.A. or holds other talks regarding establishing a trade relation with BOHAMET S.A., this Privacy Notice regards you.

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2. You can contact the controller by post at the above address, by phone at +48 52 3203900, or by e-mail: sekretariat@bohamet.pl
3. Your personal data is processed for the purposes of establishing trade relations between BOHAMET S.A. and your employer or other entity on behalf of which you are acting. This applies in particular to talks with counterparts held for the purpose of selling products and services offered by BOHAMET S.A. or for purchasing products from external suppliers or services from subcontractors or other third-party entities. We indicate that you are the contact person of a prospective customer which entitles BOHAMET S.A. to contact you with the purpose of conducting trade talks and entering into a contract with your employer/principal. It constitutes a legitimate interest of the data controller, and the legal basis for the processing of your personal data is Article 6(1)(f) of GDPR, permitting data processing in cases where it is necessary for the purpose of pursuing legitimate interests by the controller.
4. The recipients of your personal data may be:
 - a. entities providing IT support service to the Controller,
 - b. legal and advisory service providers (in particular law firms, tax advisors),
 - c. entities providing postal and courier services.
5. Where personal data is being processed for the purpose of concluding a contract between BOHAMET S.A. and a prospective counterpart, we shall process your personal data for the period of negotiations and talks regarding the contract at hand. Should the contract be concluded, we shall process your data for the term of the contract and after it expires – until the expiry of the limitation period regarding claims arising from that contract, including tax claims. Detailed information regarding the processing of personal data of a counterparty after entering into a contract can be found in the Privacy Notice for counterparts.

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6. You have the right to access your data, the right to request rectification or erasure of your data, the right to restrict its processing, and the right to object to your personal data being processed.
7. Should you conclude that the processing of your personal data violates the provisions of GDPR, you have the right to lodge a complaint with the President of The Office for Protection of Personal Data.
8. For the purpose of taking measures prior to concluding a contract between BOHAMET S.A. and your employer/principal we process your identification and contact data, particularly personal data such as: first name, last name, phone number, e-mail address, and information regarding your place of work.
9. We obtained your personal data directly from you, your employer, or a person who indicated you as a contact person, or from publicly available sources, such as the website of your employer.
10. Your personal data is not shared with a third country or an international organisation.
11. In the processing of your data the controller does not utilise automated decision-making (e.g. artificial intelligence) or profiling in the meaning of GDPR.

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Privacy Notice for Customers/Counterparts of BOHAMET S.A. headquartered in Ciele

This Privacy Notice regards persons who are a party to a contract concluded between those persons and BOHAMET S.A. The contract may regard e.g. a purchase of products of BOHAMET S.A., sale of products to BOHAMET S.A., or providing services as a subcontractor or provider. We point out that such contracts may take form other than written – e.g. an oral contract, a contract concluded via e-mail or through, for example, a purchase order.

Pursuant to the 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, OJ UE L 119, 4.5.2016) – hereinafter referred to as: “GDPR”, we inform that:

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2. You can contact the controller by post at the above address, by phone at +48 52 3203900, or by e-mail: sekretariat@bohамет.pl
3. Your personal data as data of a Customers/Counterpart of BOHAMET S.A. is processed for the purposes of concluding and performing a contract/contracts, the subject of which is a purchase of goods by a customer, or a purchase of specific goods or services by BOHAMET S.A. from its counterparts, e.g. purchasing goods necessary for BOHAMET S.A. to conduct business or making use of services of third parties or subcontractors, such as entities offering IT support services, advisory services, financial services, freight forwarding services, or transport services. The legal basis for processing this data is Article 6(1)(b) of GDPR which states that data processing is permitted in cases where data processing is necessary for performing a contract to which the data subject is party.
4. Furthermore, we may process your data for the purpose of complying with legal obligations of BOHAMET S.A., involving, inter alia, the issuing, delivery, and keeping of tax documentation and issuing and keeping of accounting (financial) records, which obligations are incumbent on the controller, with the legal basis for processing of this data being Article 6(1)(c) of GDPR which states that data processing is permitted where it is necessary for compliance with a legal obligation to which the controller is subject.
5. We may also sometimes process your data for the purpose of pursuing legitimate interests of the controller, particularly for the establishment and pursuit of potential claims and for defending against potential claims, and, for example, for handling filed complaints. This constitutes our legitimate interest and in those cases data is processed on the basis of Article 6(1)(f) of GDPR which states that one of the admissible grounds for data processing is the necessity to process it for the purpose of pursuing legitimate interests of the controller or a third party.
6. The recipients of your personal data may be:
 - a. entities providing IT support service to the Controller,
 - b. legal and advisory service providers (in particular law firms, tax advisors),
 - c. entities providing postal and courier services,
 - d. entities providing freight forwarding or transport services.

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7. Provision of personal data for the purpose of performing a contract/contracts may be a prerequisite for conclusion and performance of this/those contract/contracts. The obligation to provide data necessary to perform legal obligations results from the applicable law and failure to provide such data may result in an inability to observe obligations deriving from the provisions of law, and consequently in an inability to establish or continue cooperation with BOHAMET S.A.
8. We shall process your data for the duration of the term of the concluded contract or for the period of cooperation between the parties, as well as after the contract/cooperation expires – until the expiry of the limitation period regarding claims arising from that contract or cooperation, in principle equal to 3 years in case of traders or 6 years in case of consumers. We keep data processed for the purpose of complying with tax obligations for 5 years from the end of the fiscal year in which those tax obligations came to be – that is, in principle, from the date of performing and settling of a contract concluded between BOHAMET S.A. and the counterpart.
9. You have the right to access your data, the right to request rectification or erasure of your data, the right to restrict its processing, the right to request transfer of your data, and the right to object to your personal data being processed.
10. Should you conclude that the processing of your personal data violates the provisions of GDPR, you have the right to lodge a complaint with the President of The Office for Protection of Personal Data.
11. For the purpose of concluding and performing a contract between the parties we process your identification and contact data, particularly personal data such as: first name, last name, phone number, and e-mail address, as well as information regarding your business and other information necessary for concluding and performing contracts/maintaining economic cooperation, such as information regarding financial statements, purchased and sold products or services and other information regarding economic cooperation between the parties.
12. We obtained your personal data directly from you or from publicly available sources, such as your website.
13. Your personal data is not shared with a third country or an international organisation.
14. In the processing of your data the controller does not utilise automated decision-making (e.g. artificial intelligence) or profiling in the meaning of GDPR.

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Privacy Notice for employees and representatives of Customers/Counterparts of BOHAMET S.A. headquartered in Ciele

This Privacy Notice regards employees and associates of the economic entities (e.g. companies, businesses, etc.) who contact us on behalf of their employers/principals. Therefore, if you are a person responsible for contacting BOHAMET S.A. as a customer or a counterpart in connection with a contract concluded between the organisation you work for and BOHAMET S.A. which may regard e.g. a purchase of products from BOHAMET S.A., sale of products for BOHAMET S.A., or providing services as a subcontractor or a provider. We point out that such contracts may take form other than written – e.g. an oral contract, a contract concluded via e-mail or through, for example, a purchase order.

Pursuant to the 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, OJ UE L 119, 4.5.2016) – hereinafter referred to as: “**GDPR**”, we inform that:

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2. You can contact the controller by post at the above address, by phone at +48 52 3203900, or by e-mail: sekretariat@bohamet.pl
3. Your personal data is processed for the purposes of concluding and performing contracts between BOHAMET S.A. and your employer or other entity on behalf of which you are acting. This applies in particular to economic relations established and maintained by BOHAMET S.A. the purpose of which is selling products or services offered by BOHAMET S.A. or purchasing goods necessary for BOHAMET S.A. to conduct business or making use of services of third parties or subcontractors, such as entities offering IT support services, advisory services, financial services, freight forwarding services, or transport services. We indicate that you are the contact person or a representative of the counterpart which entitles BOHAMET S.A. to contact you with the purpose of conducting and performing the contract of which BOHAMET S.A. and your employer/principal are parties. It constitutes a legitimate interest of the data controller, and the legal basis for the processing of your personal data is Article 6(1)(f) of GDPR.
4. Furthermore, we may process your data for the purpose of complying with legal obligations of BOHAMET S.A., involving, inter alia, the issuing, delivery, and keeping of tax documentation and issuing and keeping of accounting (financial) records, which obligations are incumbent on the controller, with the legal basis for processing of this data being Article 6(1)(c) of GDPR which states that data processing is permitted where it is necessary for compliance with a legal obligation to which the controller is subject.
5. We may also sometimes process your data for the purpose of pursuing legitimate interests of the controller, particularly for the establishment and pursuit of potential claims and for defending against potential claims, and, for example, for handling filed complaints. This constitutes our legitimate interest and in those cases data is processed on the basis of Article 6(1)(f) of GDPR which states that one of the admissible grounds for data processing is the necessity to process it for the purpose of pursuing legitimate interests of the controller or a third party.

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6. The recipients of your personal data may be:
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 - b. legal and advisory service providers (in particular law firms, tax advisors),
 - c. entities providing postal and courier services,
 - d. entities providing freight forwarding or transport services.
7. Provision of personal data for the purpose of performing a contract/contracts may be a prerequisite for conclusion and performance of the contract between your employer/principal and BOHAMET S.A. Consequently, refusal to provide such data may result in an inability to establish economic relations or an inability to perform the contract.
8. We shall process your data for the duration of the term of the contract concluded between BOHAMET S.A. and your employer or principal or for the period of cooperation between the parties, as well as after their expiry – until the expiry of the limitation period regarding claims arising from that contract or cooperation, in principle equal to 3 years in case of traders. We keep data processed for the purpose of complying with tax obligations for 5 years from the end of the fiscal year in which those tax obligations came to be – that is, in principle, from the date of performing and settling of a contract concluded between BOHAMET S.A. and the counterpart.
9. You have the right to access your data, the right to request rectification or erasure of your data, the right to restrict its processing, the right to request transfer of your data, and the right to object to your personal data being processed.
10. Should you conclude that the processing of your personal data violates the provisions of GDPR, you have the right to lodge a complaint with the President of The Office for Protection of Personal Data.
12. In the course of cooperation between the parties we may process your identification and contact data, particularly personal data such as: first name, last name, phone number, e-mail address, and information regarding your place of work.
13. We obtained your personal data directly from you, your employer/principal, or a person who indicated you as a contact person, or from publicly available sources, such as the website of your employer.
14. Your personal data is not shared with a third country or an international organisation.
15. In the processing of your data the controller does not utilise automated decision-making (e.g. artificial intelligence) or profiling in the meaning of GDPR.

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