

PRIVACY POLICY KAWA.SKA SP. Z O.O.

Introductory information

As part of this Privacy Policy, we present the most important information regarding our processing of personal data under the Regulation (EU) 2016/679 of the European Parliament and of the Council, dated the 27th of 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 "GDPR").

Personal Data Administrator

1. The administrator of your personal data is KAWA.SKA Spółka z o. o., ul. Zaczarowej Róży 1, 05-540 Zalesie Górne (hereinafter referred to as the Administrator or the Company). You can contact the Administrator by writing to the above correspondence address or by e-mail: odo@kawaska.pl
2. In case of any doubts related to the processing of your data, you can contact the Data Protection Inspector at: iod@kawaska.pl or in writing at the address of the Administrator's registered office.

Data deletion

1. Pursuant to Art. (7)(3), Regulation (EU) 2016/679 of the European Parliament and of the Council, dated the 27th of 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 ("GDPR") in order to withdraw your consent to your personal data processing, please send an e-mail to info@kawaska.pl, stating the data you want to be deleted from the system.
2. Withdrawal of the consent does not affect the data processing that took place before submitting the declaration of withdrawal.

Obtaining data and the purpose of their processing

KAWA.SKA Sp. z o. o. (hereinafter referred to as: "KAWA.SKA") is a supplier of microscope systems and laboratory devices, as well as reagents and consumable products used for research in the field of biology, molecular biology, molecular diagnostics, histopathology and imaging, environmental protection and food testing, and offers its customers modern laboratory equipment as well as diagnostic and research technologies. While conducting our business activities, we process personal data for the following purposes:

Purpose of data processing:

Recruitment (employment contract)

Conducting recruitment (employment contract)

Legal basis and data storage period

- a. in order to take actions necessary to conclude a contract, at your request (Art. 6(1)(b) of the GDPR),
- b. to the extent resulting from legal provisions, in particular the Labor Code - pursuant to Art. 6(1)(c) GDPR, in order to carry out the recruitment process,
- c. to the extent that the Administrator processes data regarding health in connection with the need to refer the candidate to preliminary examinations and obtain a medical certificate confirming the lack of contraindications to work in a specific position pursuant to Art. (9)(2)(b) GDPR,
- d. if a candidate provides other data than required by law - based on his/her consent, in order to carry out the recruitment process (Art. 6(1)(a) GDPR, and in the event of providing special category data, also Art. 9(2) (a) GDPR),
- e. in the event of additional consent - for the purposes of consideration in future recruitment (Art. 6(1)(a) GDPR),
- f. in the event of additional consent - to contact persons indicated by the candidate for providing references (Art 6(1)(a) GDPR),
- g. personal data will be processed for 3 months, and in the event of consent to participate in further recruitment - for 12 months from the end of the recruitment process. In the event of reasonable possibility of any claims, personal data will also be stored to the expiry of their limitation periods.

Legitimate interest (Article 6(1)(f) of the GDPR), if applicable.

Personal data are processed in order to implement the legitimate interest of the Administrator consisting in determining, investigating or defending against such claims (Art. 6(1)(f) GDPR, and in the event of providing special category data, also Art. 9(2)(f) GDPR).

Recruitment (civil law contract)

Legal basis and data storage period

- a. in order to take action at the recruiter's request and for the purpose of concluding and implementing the contract (Art. 6(1)(b) GDPR),
- b. for the purposes indicated in the consent to personal data processing - if such a consent was provided (Art. 6(1)(a) GDPR, Art.9(2)(a) GDPR),
- c. in the event of an additional consent - for the purposes of consideration in future recruitment (Art. 6(1)(a) GDPR),
- d. in the event of an additional consent - to contact persons indicated by the candidate for providing references (Art. 6(1)(a) GDPR),
- e. personal data will be processed for 3 months, and in the event of consent to participate in further recruitment - for 12 months from the end of the recruitment process. In the event of reasonable possibility of any claims, personal data will also be stored to the expiry of their limitation periods.

Legitimate interest (Article 6(1)(f) of the GDPR), if applicable.

In order to implement the legally justified interest of the Administrator consisting in determining, pursuing or defending against such claims (Art. 6(1)(f) GDPR, and in the event special category data are made available, also Art. 9(2)(f) GDPR)

Employment process

Legal basis and data storage period

- a. Art. 6 (1) (b) GDPR in order to conclude and perform an employment contract;
- b. Art. . 6 (1) (c) and Art. 9 (2) (b) GDPR in order to fulfill obligations arising from Labor Law, by which the following is also understood:
 - performing occupational health and safety duties,
 - settlement of all receivables,
 - reporting employees to appropriate offices,
 - archiving personal files,
 - performing obligations towards ZUS [Polish Social Insurance Institution] , tax offices and the National Health Fund,
 - assessment of the employee's ability to work,
 - fulfillment of the legal obligation arising from Art. 8 of the Act dated the 4th of March , 1994 on the company social benefits fund (consolidated text: Journal of Laws of 2019, item 1352, as amended) and the ZFŚS regulations;
- c. Art. 6 (1) (9) and (2) (a) GDPR for the purposes indicated in the consent to personal data processing - if such consent was provided;
- d. personal data will be stored for the duration of employment period and after the end of the employment period:
 - until the limitation period for claims under the employment contract expires, including: in accordance with art. 291 of the Labor Code, i.e. in principle for 3 years,
 - until the obligation to archive data expires, i.e. HR files are archived for 50 years from the date of employment termination by the insured employee or up to 10 years, for, among others, contracts concluded after the 1st of January , 2019;
 - personal data contained in the documentation on the basis of which ZFŚS benefits were granted, and in other documentation, e.g. in employees' applications for benefits, will be stored for 5 years;
 - until the date of submitting a justified objection or withdrawal of consent, if the basis for personal data processing is the legitimate interest of the administrator or the voluntary consent of the data subject;
 - video surveillance recordings will be stored for a period of up to 3 months, and if necessary to determine, pursue or defend claims - until the claims are finally satisfied or the limitation period expires.

Legitimate interest (Article 6(1)(f) of the GDPR), if applicable

Art. 6 (1) (f) GDPR in order to implement the legitimate interest of the administrator, i.e.:

- determining, pursuing and defending possible claims related to the concluded employment contract,
- using video monitoring/e-mail monitoring/Internet monitoring,
- implementation of contracts with the organization's clients, contractors and suppliers.

E-mail correspondence and traditional mail

Legal basis and data storage period

- personal data are processed in connection with the concluded contract or in connection with activities undertaken before concluding the contract (Art. 6(1)(b) GDPR), in order to conduct correspondence and ensure the circulation and archiving of documents, which constitutes the Administrator's legitimate interest (Art. 6(1)(f) GDPR);
- data are processed for the periods of contract execution, correspondence, periods indicated by law, and if they are not indicated for specific documents, for the time when their storage lies within the Administrator's legally justified purpose regulated by the time of possible claims. However, the storage period of data constituting the content of correspondence depends on the purpose of data processing related to the correspondence (if there are other deadlines for data deletion, information on this subject is provided in a separate information clause).

Legitimate interest (Article 6(1)(f) of the GDPR), if applicable.

Personal data are processed in connection with the concluded contract or in connection with activities undertaken before concluding the contract (Art. 6(1)(b) GDPR), in order to conduct correspondence and ensure the circulation and archiving of documents, which constitutes the Administrator's legitimate interest (Art. 6 (1)(f) GDPR).

Processing data of natural persons and of natural persons conducting business activity who conclude a contract with KAWA.SKA

Legal basis and data storage period

- in order to take action before the conclusion and implementation of a contract at the request of data subjects or in connection with its conclusion and performance pursuant to Art. 6 (1) (b) GDPR;
- in order to fulfill legal obligations pursuant to Art. 6 (1) (c) GDPR in connection with , among others, art. 74 (2) of the Accounting Act and art. 32, art. 70 and art. 86 of the Act of the 29th of August , 1997, Tax Ordinance (fulfilment of legal obligations, in particular, of the obligation to conduct financial reporting);
- for the purpose indicated in the consent to personal data processing - if such consent was provided (Art. 6(1)(a) GDPR);
- data will be processed for the following period:
 - the duration of negotiations before concluding the contract, and next, for the duration of the contract implementation and until the limitation periods for claims arising from the contract expire;
 - expiry of the obligation to store data resulting from legal provisions, in particular the obligation to store accounting documents regarding concluded contracts (in principle, 5 years from the end of the year in which the accounting document was issued);
 - when the basis for data processing is the Administrator's legitimate interest, the data will be processed until a justified objection is raised, and in the case of data processing for the purposes of marketing activities, until the consent is withdrawn or an objection to data processing is submitted;
 - the duration of the consent validity until its withdrawal.

Legitimate interest (Article 6(1)(f) of the GDPR), if applicable

- in order to determine, pursue and defend its claims related to the above-mentioned contracts, relying on the Administrator's legitimate interest , pursuant to Art.6(1)(f) GDPR consisting in the need to defend one's rights;
- in order to conduct marketing activities, which constitute the implementation of the legally justified Company's interest (Art. 6(1)(f) GDPR), including, if you have consented to the specific form of communication, e.g. e-mail, marketing materials will be sent by the specific means of communication selected by you.

Processing data of persons participating in trainings and courses organized by KAWA.SKA

Legal basis and data storage period

- a. in order to take action before the conclusion and implementation of a contract at the request of data subjects or in connection with its conclusion and performance pursuant to Art. 6 (1) (b) GDPR;
- b. in order to fulfill legal obligations pursuant to Art. 6 (1) (c) GDPR in connection with , among others, art. 74 (2) of the Accounting Act and art. 32, art. 70 and art. 86 of the Act of the 29th of August , 1997, Tax Ordinance (fulfilment of legal obligations, in particular, of the obligation to conduct financial reporting);
- c. for the purpose indicated in the consent to personal data processing - if such consent was provided (Art. 6(1)(a) GDPR);
- d. in order to conduct marketing activities, which constitute the implementation of the legally justified Company's interest (Art. 6(1)(f) GDPR), including, if you have consented to the specific form of communication, e.g. e-mail, marketing materials will be sent by the specific means of communication selected by you.
- e. data will be processed for the following period:
 - when the legal basis for processing is Art. 6(1)(b) GDPR, the data will be processed until the limitation periods for claims arising from the contract with the client expire.
 - when the basis for data processing is Art. 6(1)(f) GDPR, the data will be processed until a justified objection is raised, when data are processed in connection with direct marketing - until marketing services are provided or an objection to data processing is submitted or consent expressed in this respect is withdrawn;
 - when the basis for data processing is Art. 6(1)(a) GDPR, the data will be processed until consent to processing is withdrawn;
 - when the basis for data processing is Art. 6(1)(c) GDPR, the data will be processed for the period indicated in specific provisions (generally, it is 5 years from the end of the year in which the accounting document was issued).

Legitimate interest (Article 6(1)(f) of the GDPR), if applicable

- a) in the case of employees, associates and representatives appointed to perform a contract - the purpose of processing is to enable the implementation of the contract concluded with the client, which constitutes the implementation of the legally justified interest of the Company (Article 6(1)(f) of the GDPR);
- b) in order to determine, pursue and defend its claims related to the above-mentioned contracts, on the basis of the Administrator's legitimate interest , pursuant to (Art. 6(1)(f) GDPR consisting in the need to defend one's rights;

Processing data of people reporting a failure within the scope of service inspections

Legal basis and data storage period

- a. acceptance, consideration and implementation of the event reported by you (the basis for processing is Art. 6(1)(b) and (c) of the GDPR), in connection with the concluded contract within the scope of which the event is reported; if you are a party to the contract; however, if you are a person cooperating with us on behalf of our client or contractor on the basis of the Administrator's legitimate interest , pursuant to Art. 6(1)(f) GDPR
- b. fulfillment of legal obligations, in particular the fulfillment of the obligation to conduct financial reporting (the basis for processing is Art. 6(1)(c) GDPR, in the scope of financial reporting settlements: in connection with, among others, the Accounting Act);
- c. indicated in the consent to personal data processing - if such consent was provided (Art. 6(1)(a) GDPR);
- d. data will be processed for the following period:
 - processing a failure or service report, and next, during the claims limitation period;
 - until the obligation to store data resulting from the legal provisions expires, in particular the obligation to store accounting documents (usually 5 years from the end of the year in which the accounting document was issued);
 - when the basis for data processing is Art. 6(1)(f) GDPR, the data will be processed until a justified objection is raised;
 - when the basis for data processing is Art. 6(1)(a) GDPR, the data will be processed until consent to processing is withdrawn.

Legitimate interest (Art. 6 (1)(f) GDPR), if applicable

- a) acceptance, consideration and implementation of the event reported by you (the basis for processing is Art. 6(1)(b) and (c) GDPR), in connection with the concluded contract within the scope of which the event is reported; if you are a party to the contract; however, if you are a person cooperating with us on behalf of our client or contractor on the basis of the Administrator's legitimate interest, pursuant to (Article 6(1)(f) GDPR);
- b) defense against possible legal claims, which constitutes the Administrator's legitimate interest (legal basis for processing is Art. 6(1)(f) GDPR);
- c) for statistical purposes related to improving work efficiency, quality of services provided and adapting them to the recipients (legal basis for processing is Art. 6(1)(f) GDPR, i.e. the Administrator's legitimate interest).

Telephone contact

Legal basis and data storage period

- a. indicated in the consent to personal data processing - if such consent was provided (Art. 6(1)(a) GDPR);
- b. data will be processed for the following period:
 - when the basis for data processing is Art. 6(1)(f) GDPR, until the communication ends or an objection is raised, if circumstances related to the investigation, determination or defense of claims arise, next, until the limitation period expires or a justified objection to data processing is submitted;;
 - when the basis for data processing is Art. 6(1)(a) GDPR, the data will be processed until consent to processing is withdrawn.
 - when the basis for data processing is Art. 6(1)(f) GDPR in the scope of marketing information - for the duration of conversations during which we provide marketing information or until an objection is raised.

Legitimate interest (Art. 6(1)(f) of the GDPR), if applicable

- a) contact, communication and consideration of the matter reported by you pursuant to Art. 6(1)(f) GDPR, i.e. legitimate interest pursued by the Administrator;
- b) depending on the content of the conversation, the Administrator's marketing activities pursuant to Art. 6(1)(f) GDPR, i.e. the Administrator's legitimate interest in providing information about its products and services;
- c) defense against possible legal claims for violation of personal data protection provisions, which constitutes the legitimate interest of the Administrator (legal basis for processing is Art. 6(1)(f) GDPR)

Website users' data processing

Legal basis and data storage period

- a) fulfillment of obligations arising from legal provisions, in particular the Telecommunications Law and the Act on the provision of electronic services (Art. 6(1)(c) GDPR),
- b) personal data will be stored until you withdraw your consent or raise a justified objection, i.e. you notify us in any way that you do not wish to remain in contact with us and receive information about our activities. After withdrawing consent or expressing objection, personal data may be stored for the purposes of demonstrating the compliance with the legal obligations incumbent on the Administrator or to the expiry of the limitation period for claims, depending on which one is longer.

Legitimate interest (Art. 6(1)(f) GDPR), if applicable

- a. to ensure the basic functions of our website pursuant to Art. 6(1)(f) GDPR, i.e. the Administrator's legitimate interest ;
- b. in connection with commenting on an article on the website pursuant to Art. 6(1)(f) GDPR, i.e. the Administrator's legitimate interest ;
- c. if you have provided appropriate (voluntary) consent, your data will also be processed in order to provide you with services, offers and messages tailored to your preferences and to analyze traffic on the website and provide social functions (depending on the preferences you have selected) (Art. 6(1)(f) GDPR); details on the use of cookies can be found in a separate cookie policy on the website.
- d. we also process personal data in connection with the implementation of other legitimate interests of the Administrator, pursuant to Art. 6(1)(f) GDPR in order to determine, pursue and defend claims and for statistical purposes related to improving work efficiency, quality of services provided and adapting them to recipients' needs.

User data processing - Microscope promotion - when purchasing a microscope, a camera or illuminator is provided for free

Below, there is information on the processing of the personal data mentioned in order to conduct and operate the Promotion - Microscope Promotion - when purchasing a microscope, a camera or illuminator is provided for free, hereinafter referred to as the "Promotion"

1. NAME AND SURNAME
2. E-MAIL
3. PHONE
4. PROVINCE/CITY

Privacy Policy

Pursuant to Art. 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council dated the 27th of 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 Regulation on data protection, hereinafter referred to as GDPR), we hereby inform that:

1. The administrator of your personal data is KAWA.SKĄ Spółka z o. o., ul. Zaczarowej Róży 1, 05-540 Zalesie Górne (hereinafter referred to as the Administrator)
2. In case of any doubts related to the processing of your data, you can contact the Data Protection Inspector at: iod@kawaska.pl.
3. Your personal data will be processed:
 - a) for the purpose of organizing and handling the Promotion, including applications processing (Art.6(1)(f) GDPR),
 - b) for the purposes indicated in the consent to personal data processing (Ar. 6(1)(a) GDPR), if you voluntarily provided such a consent,
4. The recipients of your personal data may be:
 - a) companies co-organizing events
 - b) companies conducting marketing activities,
 - c) companies providing IT services or solutions,
 - d) recipients of the co-organizers' websites,
 - e) social networking sites (Facebook, LinkedIn, Instagram),
 - f) companies archiving and destroying documents.
5. Your personal data will be stored for the period necessary to fulfill the purpose for which they were collected, i.e. implementation and organization of the Promotion. In the event of exercising author's copyright - for the period for which they are granted to the Administrator. Data collected for marketing purposes will be processed until the consent is withdrawn.
6. You have the right to:
 - a) access your data and receive a copy thereof,
 - b) rectify (correct) your data,
 - c) delete personal data,
 - d) restrict data processing,
 - e) transfer your data - if the legal basis for their processing is consent (Art.6(1)(a) or Art. 9(2)(a) GDPR) or contract (Art. 6(1)(b) GDPR) ,
 - f) withdraw your consent to data processing when it constitutes the basis for data processing (Art. 6(1)(a) GDPR), but this does not affect the processing before the date of withdrawal,
 - g) object to the processing of your personal data - if the legal basis for their processing is your legitimate interest (Art.6(1)(f) GDPR).
7. If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint with the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw.
8. Providing personal data is necessary to handle the Promotion, but providing consent to data processing is voluntary.
9. Your data will not be subject to automated decision-making.
10. Submitting the application form as part of the Promotion automatically constitutes consent to your personal data processing.

Data recipients

The recipients of your personal data may be:

- companies providing IT services or solutions;
- recruitment agency companies, i.e. Pracuj.pl;
- companies providing courier and postal services;
- public authorities receiving data in connection with the implementation of the Administrator's legal obligations,
- persons providing references indicated by the candidate (in the case of contact with a request for recommendations);
- medical facilities conducting occupational medicine examinations;
- companies providing HR services;
- banks – to pay remuneration;
- state authorities (e.g. ZUS[Polish Social Insurance Company] tax offices and other entities authorized under the law) - in order to fulfill the Administrator's obligations;
- entities providing benefits to employees;
- entities providing group insurance services for employees and co-workers;
- entities providing postal services (i.e. Poczta Polska and couriers);
- entities operating our IT systems (i.e. hosting companies, IT service providers);
- entities providing our company with legal assistance, HR, accounting, tax or advisory services
- companies providing consulting services in the field of personal data protection, companies providing marketing services,
- entities supporting our business activity, in particular: suppliers of external IT systems, e-mail, subcontractors, entities auditing our activities;
- companies that utilize or archive documents and other media - to the extent that data is stored in paper form or on these media.

Rights regarding the processed data and the voluntary nature of providing them

Each person whose data are processed by KAWA.SKA has the right to:

- access the data and receive their copy;
- rectify (correct) the data;
- delete the data;
- restrict the data processing;
- transfer their data - if the legal basis for their processing is consent (Art. 6(1)(a) or Art. 9(2)(a) GDPR) or contract (Art. 6(1)(b) GDPR);
- object to the personal data processing - if the legal basis for their processing is legitimate interest (Art. 6(1)(f) GDPR);
- withdraw the consent at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.

More information about the rights of data subjects can be found in the provisions of Articles 12-23 of the GDPR.

In addition, the person whose data is processed by KAWA.SKA has the right to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office. More information at: <https://uodo.gov.pl/pl/p/skargi>.

Do you have to provide KAWA.SKA with your personal data?

Providing data is necessary to conclude contracts and settle business activities, as well as for KAWA.SKA to meet legal requirements. This means that if you want to use the services we offer or become our contractor or employee/cooperator, you must provide your personal data.

If your employer or another entity has appointed you as a contact person in connection with the conclusion/performance of a contract with KAWA.SKA, your data will be processed to the extent disclosed by this entity (conventionally, they are: name, surname, position name, e-mail address and phone number).

In the remaining scope (in particular the processing of data by KAWA.SKA for marketing purposes), providing personal data is voluntary.

Data transfer to other countries

Personal data will generally not be transferred outside the European Economic Area (hereinafter: "EEA").

However, taking into account the provision of services by our subcontractors in the implementation of support for ICT services and IT infrastructure, KAWA.SKA may outsource specific IT activities or tasks to recognized subcontractors operating outside the EEA, which may result in the transfer of your data outside the EEA. In accordance with the decision of the European Commission, recipient countries outside the EEA ensure an adequate level of personal data protection in accordance with EEA standards. In the case of recipients in the

territory of countries not covered by the decision of the European Commission, in order to ensure an adequate level of data protection, the data exporter (administrator or processor acting on behalf of the administrator) concludes contracts with personal data recipients, which are based on standard contractual clauses issued by the European Commission in accordance with Art. 46 (2) (c) GDPR. A copy of the standard contractual clauses can be obtained from the administrator - the contact details are provided above. The method of securing your data used by the administrator is in compliance with the principles provided for in Chapter V, GDPR. You can request further information on the safeguards used in this regard, obtain a copy of these safeguards and find out where they are made available.

Personal data automated processing

Your personal data will not be used for the purpose of automated decision-making (including in the form of profiling) in such a way that as a result of such automated processing any decisions made could produce legal effects or similarly affect clients, contractors, their employees/cooperators, as well as the Administrator's employees/ cooperators, or job candidates.

Final provisions - validity of the Privacy Policy

1. The Administrator may change the Policy in the future. Each time the Administrator will post information about such a change on the Portals. With each change, a new version of the Policy will appear with a new date.
2. This version of the Policy is valid from the 1st of March, 2023.

I, Elżbieta Kozłowska-Plak, hereby certify that to the best of my knowledge and belief the above is a correct translation of the document I witnessed thereof.
Register No 2535/ 2023.
Date: 25th of September, 2023.