

# Partner in Pet Food Polska Sp. z o.o. Data Protection Notice

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## TABLE OF CONTENTS

1.	GENERAL INFORMATION AND CONTACT DETAILS.....	3
2.	UPDATES AND AVAILABILITY.....	3
3.	SPECIFIC DATA PROTECTION TERMS .....	3
4.	PURPOSE, LEGAL BASIS AND SCOPE OF PROCESSING .....	3
5.	DATA RECIPIENTS.....	6
6.	PERSONAL DATA SOURCES.....	6
7.	RETENTION PERIODS .....	6
8.	REQUIREMENT TO PROVIDE PERSONAL DATA.....	7
9.	TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA .....	7
10.	DATA PROTECTION RIGHTS AND REMEDIES.....	7

## 1. GENERAL INFORMATION AND CONTACT DETAILS

**Partner in Pet Food Polska Spółka z ograniczoną odpowiedzialnością** ("Company") processes personal data of third parties, i.e. customers and suppliers of the Company (who are hereinafter referred to collectively as "individuals"). The Company is the controller of such personal data within the meaning of the General Data Protection Regulation No 2016/679 of the EU ("GDPR").

This Data Protection Notice ("Notice") provides information regarding the processing of this personal data and rights and remedies of individuals with regards to said data processing.

### Contact details of the Company:

- **Registered seat:** Warsaw
- **Full address:** ul. Szamocka 8, 01-748 Warsaw
- **Number in the National Court Register** (Krajowy Rejestr Sądowy): 0000542050
- The Company is registered at the District Court for the Capital City of Warsaw in Warsaw, 14<sup>th</sup> Commercial Division of the National Court Register
- **Telephone number:** +48 22 569 24 10
- **E-mail address:** info.pl@ppfeurope.com
- **Website:** <http://www.ppfeurope.com/>

## 2. UPDATES AND AVAILABILITY OF THE NOTICE

The Company reserves the right to unilaterally modify this Notice with immediate effect subsequent to such modification, subject to the limitations provided for by law and the requirements of advance notification to the individuals in due time, if necessary. The Company may modify this Notice, particularly when it is required as a result of changes in the laws, the practice of the data protection authority, business needs, any newly revealed security exposures or if it is deemed necessary because of individuals' feedback. When communicating in relation to this Notice or privacy issues, or otherwise keeping in contact with individuals, the Company may use the contact details of individuals available to the Company in order to get or keep in contact with individuals. The Company will inform individuals if updates of this Notice will have an effect on the individuals or on the way the Company uses their personal data.

## 3. SPECIFIC DATA PROTECTION TERMS

In certain cases, specific privacy-related terms and conditions may also be applicable to certain individuals; said individuals will be duly notified.

## 4. PURPOSE, LEGAL BASIS AND SCOPE OF PROCESSING

The table below describes purposes, legal bases and scope of individuals' processing of personal data by the Company. Where processing is required for legitimate interests of the Company, the Company will perform a balancing test of the underlying interests, which is available upon a request submitted to the Company by means of the contact details listed herein above.

### 4.1 PERSONAL DATA OF CUSTOMERS

Purpose of the processing	Legal basis of the processing	Scope of processed data
<b>Actions leading to the conclusion of a contract</b>	Processing at the request of the customer prior to entering into a contract,  or  legitimate interests of the Company, in case the action leading to conclusion of the	a. <b>Sole traders:</b> name, company name, address, telephone number, email address, tax identification number, bank account number  b. <b>Companies</b> (contact persons): name, telephone number, email address, position

Purpose of the processing	Legal basis of the processing	Scope of processed data
	contract is initiated by the Company consisting in aiming at obtaining new customers.	
<b>Performance of a contract with the customer (including ordering of goods and services and payment management)</b>	Necessity for the performance of a contract;  Compliance with legal obligations	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address, tax identification number, bank account number</p> <p>b. <b>Companies (contact persons):</b> name, telephone number, email address, position</p>
<b>Liaising with customers (correspondence, phone calls, meetings)</b>	The Company's legitimate interests in building and maintaining relationships with customers	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address</p> <p>b. <b>Companies (contact persons):</b> name, telephone number, email address, position</p>
<b>Marketing of goods and services</b>	Consent;  Legitimate interests in promoting products of the Company and its brand	<p>a. <b>Sole traders:</b> name, address, email address, photograph, other information provided by individual (e.g. gender, marital status, professional status, lifestyle)</p> <p>b. <b>Companies (contact persons):</b> name, address, email address, photograph, other information provided by individual (e.g. gender, marital status, professional status, lifestyle)</p> <p>c. <b>Consumers:</b> name, address, email address, photograph, other information provided by individual (e.g. gender, marital status, professional status, lifestyle provided on social media platforms)</p>
<b>Handling requests received by the Company (e.g. inquiries, comments, complaints from customers and consumers)</b>	Legitimate interests in maintaining commercial relationships and market reputation of the Company	<p>a. <b>Sole traders:</b> name, address, email address, information concerning particular request</p> <p>b. <b>Companies (contact persons):</b> name, email address, information concerning particular request</p> <p>c. <b>Consumers:</b> name, email address, information</p>

Purpose of the processing	Legal basis of the processing	Scope of processed data
		concerning particular request
<b>Dispute settlement and enforcement of claims</b>	Necessity for the establishment, exercise or defence of legal claims	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address, tax identification number, bank account number</p> <p>b. <b>Companies</b> (contact persons): name, telephone number, email address, position</p>

#### 4.2 PERSONAL DATA OF SUPPLIERS

Purpose of the processing	Legal basis of the processing	Scope of processed data
<b>Actions leading to the conclusion of a contract</b>	<p>Processing at the request of the supplier prior to entering into a contract,</p> <p>or</p> <p>legitimate interests of the Company, in case the action leading to conclusion of the contract is initiated by the Company consisting in aiming at obtaining new suppliers</p>	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address, tax identification number, bank account number</p> <p>b. <b>Companies</b> (contact persons): name, telephone number, email address, position</p>
<b>Performance of a contract with the supplier (including ordering of goods and services and payment management)</b>	Necessity for the performance of a contract; Compliance with legal obligations	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address, tax identification number, bank account number</p> <p>b. <b>Companies</b> (contact persons): name, telephone number, email address, position</p>
<b>Liaising with suppliers (correspondence, phone calls, meetings)</b>	The Company's legitimate interests in building and maintaining relationships with suppliers	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address</p> <p>b. <b>Companies</b> (contact persons): name, telephone number, email address, position</p>
<b>Dispute settlement and enforcement of claims</b>	Necessity for the establishment, exercise or defence of legal claims	<p>a. <b>Sole traders:</b> name, company name, address, telephone number, email address, tax identification number, bank account number</p> <p>b. <b>Companies</b> (contact persons): name, telephone number, email address, position</p>

Purpose of the processing	Legal basis of the processing	Scope of processed data
<b>Microsoft Teams and Stream services - using screen sharing, online communication, meeting, web and video conferencing, and video streaming services.</b>	The Company's legitimate interests to provide those partner communication channels, which are necessary for the normal conduct of business.	Content and information shared while using the services.
<b>Verifying the proper use of the Company's email accounts</b>  <b>Employees of the Company may use their e-mail account in accordance with specific internal regulations. During the verification of proper use, the Company may have access to e-mails sent to the Company or its employees by external persons to the PPF e-mail address.</b>	The Company's legitimate interests to verify the proper use of the Company's e-mail account provided by the Company to the Company's employees, to protect the Company's trade secrets and intellectual property, to clarify liability for possible infringements, to prevent, assess damage, etc. related to a personal data breach or data loss.	The data traffic pertaining to the e-mail address, the senders of the incoming e-mails, the recipients of the e-mails sent, the e-mail headers, the content of the e-mails and any attachments.
<b>Transport organisation by using the Transporeon system</b>	The Company's legitimate interest to optimise its logistics procedures.	Data relating to transport orders: data relating to transport (loading, exact place, address, date of unloading, etc.), offers, transport documents, etc., as well as the driver's name and telephone number, registration number of the means of transport carrying the transport (for contact with the driver), comments on freight.

## 5. DATA RECIPIENTS

The Company shares personal data of customers and suppliers with the following recipients:

- advertising agencies located in Poland;
- services provider of the Salesforce Sales Cloud located in Ireland;
- services providers from the Microsoft group of companies located in as well as outside the European Economic Area that provide Microsoft Teams and Stream services;
- IT services providers located in Poland;
- state authorities located in Poland.

## 6. PERSONAL DATA SOURCES

The Company collects personal data of individuals **directly from customers, suppliers and consumers**. In certain circumstances the Company collects personal data of customers, suppliers and consumers from the following sources: **social platform provider** (Facebook), **publicly accessible sources** (the National Court Register, the Central Registration and Information on Business), **public authorities** (e.g. tax authorities, enforcement authorities).

## 7. RETENTION PERIODS

The Company keeps personal data of individuals for the duration of its cooperation with customers and suppliers and, after termination of such cooperation, for the time provided for in provisions of law, in particular tax law, as well as for the duration of statutory periods of limitation of claims which may arise from the concluded contracts. In case a dispute arises between the Company and its customer or supplier, the Company will keep personal data for a longer period, that is until the final termination of legal proceedings and until the Company's demands have been effectively enforced. Personal data of consumers are kept by the Company for five years.

## **8. REQUIREMENT TO PROVIDE PERSONAL DATA**

Provision of personal data to the Company, in the scope indicated in this Notice, is necessary in order to conclude and execute a contract which is the basis of cooperation between the Company and its customers and suppliers. The conclusion of such contracts and their execution would not be possible without processing of individuals' personal data. Provision of personal data by newsletter subscribers (individuals and consumers) to the Company's newsletter is voluntary, however, without subscribers' personal data the Company cannot provide the newsletter to them.

## **9. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA**

Personal data will be transferred - in connection with the use of Microsoft Teams and Stream services - to a company from the Microsoft capital group located in the United States of America. This country has not been recognized by the European Commission as ensuring an adequate level of personal data protection in its territory.

The transfer of personal data to a company from the Microsoft capital group located in the United States of America takes place on the basis of an appropriate agreement containing standard contractual clauses adopted by the European Commission.

Individuals have the right to receive a copy of the contract containing standard contractual clauses adopted by the European Commission. Microsoft makes the EU Model Clauses available to customers as described in the Microsoft Online Services Terms (OST) and Data Protection Addendum (DPA).<sup>1</sup>

## **10. DATA PROTECTION RIGHTS AND REMEDIES**

Individuals whose personal data the Company processes have the following rights:

<b>Right</b>	<b>Description</b>
<b>Right to be informed</b>	Right to be provided with clear, transparent and easily understandable information on how the Company uses individuals' (including consumers') personal data and on their rights.
<b>Right of access</b>	Individuals (including consumers) have the right to obtain confirmation from the Company whether or not personal data concerning them are being processed. The Company is also obligated to provide other information pertaining to the processed personal data; this information has been provided in this Notice.
<b>Right to rectification</b>	Individuals (including consumers) have the right to request the Company to rectify inaccurate or incomplete personal data concerning them.
<b>Right to erasure (right to be forgotten)</b>	In principle, this right enables individuals (including consumers) to request the Company to delete or remove their personal data if there is no compelling reason for the Company to keep using it.

<sup>1</sup> <https://aka.ms/DPA>

<b>Right to restrict processing</b>	Individuals (including consumers) have the right to suppress further use of their personal data. When processing is restricted, the Company can still store individuals and consumers' personal data but may not use it further.
<b>Right to data portability</b>	Individuals (including consumers) have the right to receive personal data which they have provided to the Company in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the Company. This applies where the processing is based on consent or on a contract and the processing is carried out by automated means.
<b>Right to object</b>	Individuals (including consumers) have the right to object, on grounds relating to their particular situation, to processing of personal data concerning them for the purposes of legitimate interests. The Company will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual or for the establishment, exercise or defence of legal claims.
<b>Right to withdraw consent</b>	Individuals (including consumers) have the right to withdraw their consent to process personal data at any time. This does not affect the lawfulness of processing based on consent before its withdrawal.
<b>Right to lodge a complaint</b>	Individuals (including consumers) have the right to lodge a complaint with the supervisory authority (the President of the Office of Personal Data Protection – <a href="https://uodo.gov.pl/">https://uodo.gov.pl/</a> ) regarding the processing of their personal data.