

Privacy Policy

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I. Introduction

This Policy sets out the rules for **processing the personal data of users of the website** available at www.bspl.pl (the Website), operated by **BSPL 1 Sp. z o.o., with its registered office in Skawina (the Controller)**. A Website user is anyone who uses the Website in any way (the User). The Website contains information about our products and services. This Policy also covers matters relating to the processing of Users' personal data in connection with our operation of an account on the **LinkedIn social media platform (the Platform)**. The Policy also provides information about **the cookies and analytics tools** we use.

II. Basic Information

1. Identity and contact details of the personal data controller

The **Controller** of your personal data is **BSPL 1 Spółka z ograniczoną odpowiedzialnością, with its registered office in Skawina**, at ul. Pileckiego 8, 32-050 Skawina, entered in the Register of Entrepreneurs of the National Court Register, maintained by the District Court for Kraków-Śródmieście in Kraków, 11th Commercial Division of the National Court Register, under number: 0000472657, NIP (Tax Identification Number): 6762466881, REGON (National Business Registry Number): 122919243, share capital: PLN 1,337,000.00.

You can **contact** us by telephone at +48 12 252 49 49 between 8:00 a.m. and 4:00 p.m., Monday to Friday, by e-mail at biuro@bspl.pl, or in writing at: ul. Pileckiego 8, 32-050 Skawina.

2. Where do we obtain your data?

We may obtain your data directly from you when you complete the contact form available on the Website. You may also simply write to us or call us using the e-mail addresses, postal addresses and telephone numbers provided on the Website or by our representatives. Such correspondence may also be a source of data for us. The Website uses tools that ensure its secure and proper operation (server logs, internet traffic protection, consent requests), which also collect data to a certain extent.

The data required to create an account in the Customer Portal originate from our existing cooperation with you or the entity you represent, based on a contract. Furthermore, we may have obtained your personal data through the Platform and, following your consent, through the use of analytics tools and their cookies on the Website

3. How do we protect your personal data?

We assure you that the protection and security of your personal data are important elements of our business activities. To achieve these objectives, we have implemented technical and organisational measures to protect the data processed in accordance with the requirements set out in the GDPR. These measures are appropriate to the risk of infringement of your rights and freedoms.



We share your data with third parties in compliance with applicable law where this is necessary for our business activities. We respect your rights regarding the protection of personal data and enable you to exercise them.

4. Legal basis and purposes of personal data processing

Personal data are processed in accordance with 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: GDPR], and the Polish Personal Data Protection Act of 10 May 2018.

The legal bases for processing personal data are:

- A. Article 6(1)(b) of the GDPR:** *Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.*

Our purposes of processing based on the above legal basis are:

- 1) Providing Users who are our clients and natural persons with access to the Client Portal containing additional materials concerning our products and services;
- 2) Conducting negotiations and making arrangements concerning the possible conclusion of another contract with us.

- B. Article 6(1)(f) of the GDPR:** Processing is necessary for the purposes of the legitimate interests pursued by the controller.

Nasze cele przetwarzania oparte na powyższej podstawie:

- 1) Our own direct marketing:
 - a) responding to enquiries concerning our activities submitted through the contact details or contact form available on the Website, or through individual business e-mail addresses provided by our representatives,
 - b) obtaining anonymised statistical data on Users' use of the Website in order to improve the quality of the Website and the user experience;
 - c) conducting marketing activities and promoting our business on the Platform,
- 2) Ensuring the secure and lawful operation of the Website and its features,
- 3) Processing the data of representatives and contact persons of Users who are our clients, in connection with providing them with access to the Client Portal containing additional materials about our products and services and negotiating other contracts,
- 4) Establishing or pursuing our claims or defending ourselves against claims (in connection with the use of the Client Portal and negotiations concerning other contracts with us).

5. Criteria for determining the period for which personal data will be stored

We process your data:

1. In connection with providing access to the Client Portal – for the duration of the relevant arrangements and your participation in the Client Portal;

2. In connection with other contracts negotiated with us – for the duration of the negotiations preceding the conclusion of a contract,
3. For direct marketing purposes,
4. For the purpose of ensuring the secure and lawful operation of the Website and its features,
5. In connection with processing the data of representatives and contact persons of Users who are our clients, in relation to the Client Portal or other contracts – in the cases referred to in points 3–5 above, for the period necessary to achieve the relevant purpose, unless we are required to cease processing earlier as a result of an objection raised by you;
6. For the purpose of establishing, pursuing or defending against claims – for the period necessary to achieve this purpose; your data will be stored at least until the expiry of the limitation period for such claims.

6. Information on the categories of recipients of personal data

Recipients of your personal data include entities cooperating with us as part of our business activities that process data on our behalf under data processing arrangements, namely: providers of software supporting business processes (e.g. e-mail services, CRM-type planning and data management software and applications, providers of the contact form and cookie management panel on the Website), the provider of the platform on which the Website is hosted, the provider of the database storing data of logged-in Website Users, an IT company, providers of analytics services related to the Website, postal service providers and couriers (regarding data contained inside shipments).

Recipients of your data also include entities cooperating with us as part of our business activities that act as independent data controllers and have their own legal bases for processing such data, namely: the company operating the Platform, postal service providers and couriers (regarding data appearing on the outside of shipments).

7. Information on whether providing data is mandatory and the consequences of failing to provide it

When using the Website, including merely browsing it, data transmitted by the User's web browser to the Controller's server (so-called server logs) are collected automatically and on a mandatory basis. It is not possible to use the Website without processing such data. Processing the data required to create an account in the Client Portal is necessary to participate in the Client Portal. Providing personal data in all other respects is voluntary.

8. Information on the rights of data subjects

You have the right to:

- a) Access your personal data – obtain confirmation as to whether personal data concerning you are being processed and, if so, obtain access to such data, including one free copy;
- b) Rectify your personal data – correct inaccurate personal data and, taking into account the purposes of processing, complete incomplete personal data;
- c) Erase your personal data or restrict their processing,
- d) Data portability – receive your personal data from us in a structured, commonly used and machine-readable format or have them transmitted directly by us to another controller, where technically feasible;
- e) Object to the processing of your personal data,
- f) Lodge a complaint concerning the processing of your personal data,

in accordance with the provisions of the GDPR.

In the cases referred to in points b) and c), we will inform each recipient to whom your personal data have been disclosed of the relevant changes, unless this proves impossible or involves disproportionate effort. At your request, we will inform you about those recipients. To exercise your rights, please contact us using the contact details provided in point 1 of this Policy.

9. Right to object

To the extent that personal data are processed on the basis of Article 6(1)(f) of the GDPR – our legitimate interest – you have the right to object to their processing at any time on grounds relating to your particular situation. In such a case, we may no longer process your data unless we demonstrate compelling legitimate grounds for such processing that override your interests, rights and freedoms, or grounds for establishing, pursuing or defending claims. However, to the extent that personal data are processed for direct marketing purposes on the basis of our legitimate interest, you have the right to object to such processing at any time. In that case, we may no longer process your data for such purposes.

10. Right to lodge a complaint with a supervisory authority

You may lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work or place of the alleged infringement, if you believe that the processing of your data infringes the GDPR. In Poland, the supervisory authority is the President of the Personal Data Protection Office.

11. Geographical scope of data processing

We also process your data outside the European Economic Area. Such transfers take place in connection with our use of entities providing individual services related to the Website and its operation. These entities act as our data processors or joint controllers. Data transfers are carried out on the basis of standard contractual clauses adopted by the European Commission. In some cases, additional technical security measures are applied. Further information about the safeguards used may be obtained by contacting us using the contact details provided in point 1 of this Policy. Where the European Commission has not confirmed an adequate level of protection by means of an adequacy decision, transfers of data to third countries involve certain risks for data subjects. Different data processing rules apply in these countries than in the EU. Consequently, the scope of rights available to data subjects in relation to their data may be limited, or certain rights may prove impossible to enforce.

III. Website features collecting data

1. Server logs

When using the Website, including merely browsing it, data transmitted by the User's web browser to our server (so-called server logs) are collected automatically and on a mandatory basis. It is not possible to use the Website without processing such data. These data include:

- Date and time of access,
- Amount of data transferred in bytes, source/referrer through which the User accessed the Website,
- Web browser used,
- Operating system used,



- IP address used (possibly anonymised).

Legal basis for processing personal data: Article 6(1)(f) of the GDPR, i.e. our legitimate interest [ensuring the secure and lawful operation of the Website].

2. Contact form on the Website. Contact using the contact details available on the Website

You can contact us quickly and easily through the contact form available in the Contact section of the Website, or by writing to us or calling us using the contact details provided on the Website or individual business e-mail addresses provided by our representatives. Submitting a completed form or providing us with information using the contact details provided constitutes consent to us contacting you in response using the data provided in the form or other communication, within the meaning of the Electronic Communications Law. This consent is voluntary – we respect your privacy and you decide whether to contact us. You may withdraw your consent at any time by contacting us using the contact details provided in this Policy. Withdrawal of consent does not affect actions taken by us on the basis of your consent before its withdrawal.

Legal basis for processing personal data:

- a) During negotiations and arrangements concerning the possible conclusion of a contract with us: Article 6(1)(f) of the GDPR or Article 6(1)(f) of the GDPR;
- b) When responding to enquiries concerning our activities: Article 6(1)(f) of the GDPR.

3. Newsletter

Through the Website, we enable you to subscribe to our newsletter, through which we send information about our activities, products and services, news, events and other informational and marketing content. Subscribing to the newsletter is voluntary and takes place by providing an e-mail address in a form available on the Website, including in a pop-up window, and giving consent to receive commercial information from us, including direct marketing, by electronic means.

We process personal data provided when subscribing to the newsletter, in particular your e-mail address, for the purpose of sending the newsletter and managing its subscriber list. The legal basis for processing personal data in connection with sending the newsletter is Article 6(1)(f) of the GDPR, i.e. our legitimate interest in conducting direct marketing of our own products and services. Commercial information is sent by electronic means on the basis of your prior consent, in accordance with Article 398 of the Electronic Communications Law.

You may unsubscribe from the newsletter at any time by using the unsubscribe link included in each newsletter message or by contacting us using the contact details provided in this Policy. Withdrawal of consent does not affect the lawfulness of actions taken before its withdrawal. We will process your personal data for the duration of your newsletter subscription, but no longer than until you unsubscribe or object to the processing of your data for direct marketing purposes. After that time, we may retain your data to a limited extent if necessary to demonstrate compliance with applicable law or to establish, pursue or defend against claims. Data related to newsletter management may be transferred to entities providing us with IT services, hosting services and services related to the distribution of electronic messages, in accordance with the principles set out in this Policy.

4. Customer Portal

The Website also includes a so-called Client Portal, which contains additional materials relating to our products in the field of BEV/BTMS systems, such as product datasheets, 3D XI models and other materials. Access to the Client Portal is based on individual arrangements between us. The data we process in connection with creating an account in the Client Portal for you or the entity you represent include: your first and last name, e-mail address, company name and job title. You may discontinue your participation in the Client Portal at any time by sending us a request to delete your account using the contact details provided in this Policy. The account will then be deleted. However, we will retain information about your use of the Client Portal for the purposes of potentially establishing, pursuing or defending against claims.

Legal basis for processing personal data:

- a) During arrangements concerning access to and participation in the Client Portal: Article 6(1)(b) of the GDPR [concerning the conclusion and performance of a contract with our client who is a natural person] or Article 6(1)(f) of the GDPR [concerning the processing of personal data of representatives and contact persons of our client];
- b) Following withdrawal from participation in the Client Portal: Article 6(1)(f) of the GDPR [concerning the establishment, pursuit or defence of claims].

5. Cookies

When using the Website, so-called cookies are installed on your device. Cookies are small pieces of computer data, in particular text files, placed on Users' end devices when using the Website. Cookies usually contain the name of the website from which they originate, the period for which they are stored on the end device and a unique number.

The cookies we use perform the following functions:

- Enabling secure use of the Website and access to its available features (essential cookies); these cookies are activated automatically when you access the Website and do not require your consent;
- Collecting information about how Users use the Website (we receive anonymised statistical data) in order to improve the quality of the Website and the user experience (Google Analytics and Google Tag Manager – analytics cookies); these cookies are not activated until you provide your consent.

The main types of cookies, distinguished according to their storage period, are:

- Session cookies – temporary files stored on the User's end device until they log out, leave the website or change their browser settings;
- Persistent cookies – stored on the User's end device for the period specified in the cookie parameters or until they are deleted by the User.

The maximum cookie storage period is up to 2 years.

Analytics cookies are not activated until you consent to their use within the meaning of the Electronic Communications Law. You may give your consent by clicking the "Accept all cookies" option, which constitutes consent to the use of all cookies used on the Website, or by clicking the "Cookie settings" button, which allows you to give or refuse consent to analytics cookies. Consent is voluntary, and you

may withdraw it by changing these settings on the Website (the "Cookie settings" link in the Website footer) or by clearing cookies on your device, which will restore the original settings options. Withdrawal of consent does not affect the lawfulness of actions taken on the basis of consent before its withdrawal.

Regardless of the above cookie management options available on the Website, **you may also change your cookie settings** by specifying the conditions for storing or accessing cookies through the settings of the web browser software you use to access the Website. This includes disabling the acceptance of cookies in order to block their automatic handling, configuring the browser to notify you whenever cookies are sent to your end device, and changing the period for which cookies are stored. Please note, however, that since some cookies are necessary for the operation of the Website, disabling all cookies may prevent certain Website features from functioning (e.g. submitting the contact form).

Detailed information on managing different types of cookies is available in the settings of individual web browsers:

- a) **Chrome** > <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647;>
- b) **Firefox**><http://support.mozilla.org/pl/kb/W%C5%82%C4%85czanie%20i%20wy%C5%82%C4%85czanie%20obs%C5%82ugi%20ciasteczek;>
- c) **Internet Explorer** <https://support.microsoft.com/pl-pl/help/278835/how-to-delete-cookie-files-in-internet-explorer>
- d) **Opera** > <http://help.opera.com/Windows/12.10/pl/cookies.html>
- e) **Safari** > <http://support.apple.com/kb/PH5042>

IV. Analytics Tools (Based on Cookies)

1. Analytics tools - Google Analytics, Google Tag Manager

The Google Analytics 4 analytics tool is designed to analyse how you use the Website. Google Analytics collects its own cookies, i.e. data relating to the device and browser, IP address and User activities, in order to measure and report statistics on Users' interactions with the Website. When collecting data, Google Analytics 4 does not record or store IP addresses. We use Google Analytics 4 to obtain analyses of how Users use the Website, which allows us to improve it. We receive general, anonymised reports without the possibility of attributing them to a specific User. We also use Google Tag Manager, a tool that facilitates the configuration of Google Analytics and other similar tools. It eliminates the need to involve a developer for these purposes. Google Tag Manager operates on data collected by other tools.

Google tools are provided by Google Ireland Limited, with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland.

Description of Google Analytics 4 in relation to personal data:

https://support.google.com/analytics/answer/6004245#info_for_sites

Information about Google cookies and how to manage them can be found here:

<https://policies.google.com/technologies/managing?hl=pl>

More information about how Google processes data can be found here:

<https://policies.google.com/privacy?hl=pl#infochoices>.



You can also block Google Analytics using the following tool:

<https://tools.google.com/dlpage/gaoptout>

Google acts as our data processor and, through subcontractors, also processes data in third countries. Its parent company, Google LLC, is a participant in the Data Privacy Framework programme. More information is available here: <https://business.safety.google/adssdatatransfers/>.

Legal basis for processing personal data: Article 6(1)(f) of the GDPR [our own direct marketing, whereby our legitimate interest is based on your consent to analytics cookies, if you have given such consent]. Please note that, due to the nature and scope of its activities, Google acts as an independent controller of various personal data obtained in connection with its other activities. By combining the data it holds and using its technologies, Google may obtain additional information about individuals using the Internet. This may occur, in particular, when you use Google's services while logged in as a registered user.

V. Social Media Platforms

1. Account on the LinkedIn Platform

We maintain an account on LinkedIn, where registered users may, for example, post content, send private messages, follow us and share our profile. We also have access to statistics provided by LinkedIn (so-called Page Insights) for the business account through which we manage our profile. These statistics are presented to us in an anonymous form. The ability to maintain an account on the Platform is provided by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.

We and LinkedIn are joint controllers (within the meaning of Article 26 of the GDPR) of personal data processed in connection with the statistics of our page on the Platform. In accordance with the joint controllership agreement between us and LinkedIn, the Platform is responsible under the GDPR for matters relating to statistics, including fulfilling the obligations referred to in Articles 12–22 and 32–34 of the GDPR. This means that, within the above scope, LinkedIn is responsible, among other things, for fulfilling information obligations towards Platform users and enabling them to exercise their rights. LinkedIn also ensures the security of this processing by implementing appropriate technical and organisational measures. The joint controllership agreement with LinkedIn is available here: <https://www.linkedin.com/legal/l/page-joint-controller-addendum>. In all other respects, we and LinkedIn act as independent controllers of data relating to our account on the Platform. More information about the security measures used by LinkedIn is available here: <https://security.linkedin.com>.

LinkedIn therefore acts as a controller or joint controller of data from the Platform and processes data itself or through further processors, including in third countries outside the European Economic Area. More information about data processing by LinkedIn: <https://pl.linkedin.com/legal/privacy-policy>. Contact with LinkedIn's Data Protection Officer: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>.



Our legal basis for processing data under the GDPR: Article 6(1)(f), i.e. our legitimate interest [our own direct marketing]. Please note that the Platform, as an independent controller of its users' personal data, may obtain additional information about them, particularly when they use the Platform while logged in.

VI. Final Provisions

1. External links (to social media platforms)

We carefully select the entities with which we cooperate, including by verifying links to other websites posted on our Website. However, we are not responsible for the data protection standards and policies applied by these entities. We recommend that you independently verify each of our partners and, consequently, make your own decision as to whether you wish to entrust them with your personal data.

We provide a link to the LinkedIn Platform on the Website. This takes the form of a link labelled with the name of the Platform, placed on the Website and directing users to this social media service (we do not use social media plugins). The link directs users to our account on the Platform, the operation of which is described in this Policy. It is a hyperlink intended to redirect users to the relevant page on the Platform. If you are also logged in to your LinkedIn profile, information about the interactions you undertake after accessing the Platform through the link is recorded on your profile, in accordance with the features and characteristics of the Platform.

The entities responsible for personal data protection matters are: the operator of the Platform (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, <https://pl.linkedin.com/legal/privacy-policy>) and, to a certain extent, the owner of the account on the Platform (i.e. us).

2. Validity of and amendments to the Privacy Policy

We aim to continuously develop our activities while ensuring the security of the data entrusted to us. We may amend this Policy if required by applicable law or if our details, the details of other entities mentioned in the Policy, the tools we use or the technological conditions of the Website change. Amendments may also be introduced to improve the standard of information provided or the level of protection. We will inform you of any amendments when you first access the Website following a change to the Privacy Policy.