**INFORMATION POLICY ON PERSONAL DATA PROCESSING**

**by EURO TERMINAL REAL ESTATE Sp. z o.o.**

In connection with the entry into force 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 (GDPR), we inform you about the manner and purpose for which we process your personal data (hereinafter referred to as Data), as well as about your rights related to data protection.

**1. Personal data controller:**

A controller of your personal data is **Euro Terminal Real Estate spółka z o.o. with a registered office in Świnoujście 72-602 Świnoujście, ul. Jana Soltana 1, Tel.: +48 91 321 65 11, Fax: +48 91 321 65 10, E-mail: office@euro-terminal.com.** At these addresses, you will also obtain detailed information regarding the processing of your personal data by us.

**2. Why and on what basis we process your data:**

We process your data in accordance with the provisions of the GDPR and Polish personal data regulations. We do it because:

a) we comply with legal obligations (article 6 (1)(c) GDPR),

b) we perform tasks carried out in the public interest (article 6 (1)(e) GDPR),

c) we comply with contractual obligations (article 6 (1)(b) GDPR) since the processing is necessary for the performance of a contract,

d) processing is necessary for the purposes of the legitimate interests pursued by Euro Terminal or by a third party (article 6 (1)(f) GDPR) resulting from the administration of the Free Zone and the related obligations.

As the entity managing the port infrastructure and the Free Zone, we are subject to a number of legal obligations resulting from, for example, customs and tax regulations, port regulations and other regulatory requirements. We may also be obliged, in the public interest, to carry out tasks including, in particular, crime prevention. If necessary, we will process your data to comply with the requirements imposed by these regulations.

The data are also processed for the purpose of carrying out the activities (e.g. entry to the Free Zone), conclusion or performance of a contract (e.g. transport, storage or loading) for which they were provided to Euro Terminal, depending on the circumstances, prior to or in connection with the conclusion or performance of such a contract.

Your data may also be processed for such purposes as verification of identity of contractors and persons representing them or acting on their behalf, fulfilment of duties related to monitoring the timeliness of payment of receivables and risk management, and finally performance of duties in respect of taxes, customs and settlement of accounts.

We also process the data when necessary, for the purposes resulting from legitimate interests exercised by Euro Terminal or a third party. We do this, for example, when we act to ensure the IT security of Euro Terminal, in order to pursue claims and defend against claims, for internal administrative purposes such as employee or cooperation matters, preparation of statistics and reporting within the Euro Terminal Group.

We also process the data based on your consent given for specific purposes. This consent may be withdrawn by you at any time. Withdrawal of the consent does not affect the legality of the processing of the data by Euro Terminal until such consent is withdrawn or when Euro Terminal processes your data on a basis different than your consent.

**3. What data do we process**

To perform the services for you, we process the data necessary to enter the Free Zone as well as necessary for the conclusion, performance and termination of contracts, including name and surname, PESEL *[personal identification number],* NIP *[tax identification number]*, contact details, including address, data regarding the vehicle or semi-trailer entering the premises of Euro Terminal, e.g. registration number, data of a ship at berth, CCTV recordings.

**4. To whom we transfer the data**

The data can be made available to other recipients in order to perform the contract with you, in order to comply with a legal obligation imposed on Euro Terminal, based on your consent, or for the purposes arising from the legitimate interests of the controller or a third party. The recipients may be in particular: authorized employees of the Company and other persons authorized by the Company, customs and tax authorities, managing bodies of Szczecin-Świnoujście Ports, clearing agencies, credit and payment institutions, labour and insurance law institutions, insurance companies, entities of Euro Terminal group. The data are also transferred to entities that process data on behalf of Euro Terminal and persons acting under their authority, while such entities process data on the basis of an agreement with Euro Terminal and only in accordance with Euro Terminal instructions and subject to secrecy. The group of these entities includes entities providing services for Euro Terminal, in particular in the field of banking, IT, debt collection, legal, insurance, agency, brokerage and marketing.

**5. Transfer of data to a third country (outside the European Union)**

The data can be transferred to recipients to a third country outside the European Union:

a) If it is necessary to perform the contract concluded with you or to take action for the purpose of conclusion of such contract, before concluding such a contract,

b) As part of using the IT infrastructure (cloud, e-mail) by Euro Terminal.

In such case we comply with European standards to ensure the appropriate level of protection of your data. You can obtain a copy of the transferred data after submitting such a request to the data protection officer. The data can also be transferred after obtaining your consent. Accordingly, your data will be transferred on the basis of article 49 (1)(a) or (b) GDPR.

**6. For how long do we process your data**

Your data will be processed only for the period necessary to achieve the processing purposes indicated in point 2:

a) for the performance of the contract concluded with the Company - until the completion of such performance, and after that time for the period required by law or for the pursuance of any claims,

b) for the fulfilment of legal obligations incumbent on the Company in connection with conducting a business and performance of the concluded contracts - until such time as the Company fulfils these obligations; please note that some data related to official documents will have to be kept for at least 5 years

c) for the processing carried out exclusively on the basis of consent - until the date of immediate erasure of data, upon your request,

d) until fulfilment of the legitimate interests of the Company that underlie this processing or until you object to such processing, unless there are legitimate grounds for further processing.

**7. What rights do you have to ensure the proper protection of data**

You have the right to:

a) demand access to your data, as well as demand their rectification, limiting their processing or their erasure,

b) withdraw at any time the previously granted consent to the processing of data to the extent covered by such consent,

c) demand transfer of the provided personal data processed for the purpose of conclusion, performance of the contract or based on your consent.

d) lodge a complaint to the supervisory authority, which in the Republic of Poland is the President of the Office for Personal Data Protection, if you believe that the processing of your data violates the law,

e) object to the data processing.

**8. Are you obligated to provide the data:**

To the extent that EURO TERMINAL processes your data in order to perform the activities requested by you or to enter into a contract and to perform the contract, the provision of data by you is a condition for the performance of these activities or the conclusion and performance of the contract. Provision of data is voluntary, but it is necessary for the performance of the requested activities or to conclude and perform the contract. In addition, where it is required by regulations such as customs, tax or anti-money laundering or terrorist financing regulations, we are particularly obliged to identify and collect data. Thus, the regulations require that we should be provided with these data and notified of any changes. If the data are not provided, we will not be able to carry out the requested activities or enter into and perform contracts and provide services. Please note that the refusal to provide the data required by the regulations may result in the inability to enter the Free Zone.

**9. From whom we obtain your data:**

We obtain data only from you or, where you are employees or associates of our contractors, also from them.

**10. Data profiling**

Your data are not profiled, in particular we do not use any forms of automatic decision-making or providing you with information tailored to your business profile.