

Information clause for Business Partners (Clients and Suppliers)

I. Personal Data Controller (Controller)

Grant Thornton Legal Maślanko Kancelaria Prawna spółka komandytowa with the registered seat in Poznań, at ul. Abpa. A. Baraniaka 88 E (61-131 Poznań), entered into the Register of Entrepreneurs under KRS number 0000444633.

The Controller does not have a Data Protection Officer as it is not legally obliged to appoint one.

If you have any questions on data protection, please contact us at: iod@pl.gt.com.

II. Purposes and legal bases of personal data processing

No.	Purpose of processing	Legal basis	Period of processing
1.	Establishment of commercial contacts	Article 6(1)(f) of GDPR (legitimate interest)	Until you submit an effective objection to processing for this purpose.
2.	Conclusion and performance of the sales agreement	Article 6(1)(b) of GDPR (fulfilment of the contract)	Until fulfilment of the agreement.
3.	Handling the enquiries of prospective and existing Clients, including claims and complaints	Article 6(1)(f) of GDPR (legitimate interest)	Until fulfillment of the agreement.
4.	Maintenance of accounting and tax documentation	Article 6(1)(c) of GDPR (legal obligation)	5 years after the end of the calendar year in which the tax was due.
5.	Compliance with the anti-money laundering and financing of terrorism regulations	Article 6(1)(c) of GDPR (legal obligation)	5 years after the end of the year in which transactions or business relations with the client expired.
5.	Acceptance of a report and investigation of the report in accordance with the Whistleblower Protection Act	Article 6(1)(c) of GDPR (legal obligation) Regarding sensitive data: Article 9(2)(g) of GDPR (substantial public interest, on the basis of EU and Polish law)	For 3 years after the end of the calendar year, in which the follow-up activities were completed, or after the completion of the proceedings initiated by these activities. Personal data that are not relevant to the case, are not collected, and if accidentally collected, they are immediately deleted. The deletion of such personal data shall take place within 14 days after it is determined that it is not relevant to the case.
6.	Investigation of claims and protection against claims	Article 6(1)(f) of GDPR (legitimate interest)	For the period of the statute of limitations on claims (3 years from the end of the year in which cooperation ended).
7.	Direct marketing of own products and services	Article 10(2) of Act on Electronically Supplied Services (pl. <i>Ustawa o świadczeniu usług drogą elektroniczną</i>) in connection with Article 6(1)(a) of GDPR (consent)	Until you withdraw your consent. Withdrawal of the consent does not affect lawfulness of processing performed prior to the withdrawal.

8.	Direct marketing of products or services of entities from the group affiliated with the Controller	Article 6(1)(f) of GDPR (legitimate interest)	Until you submit an effective objection to processing for this purpose, but no longer than 24 months.
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III. Do I have to provide you with my data?

If the data were not obtained directly from you, this means that the source of origin of the data is your employer or an entity represented by you.

IV. Data recipients

We may share your personal data with: postal operators, state authorities, [companies related to the Controller](#), including entities associated within Grant Thornton International (GTI) - as part of internal administrative purposes, as well as in cases of entrusting personal data if the associated entity is a subcontractor of the Controller.

Additionally, the data may be transferred in particular to software providers, IT service providers, administrative support providers, document shredding service providers, data protection consultants, marketing service providers and other suppliers of the company.

V. Transfer of personal data to a third country

Personal data will generally not be transferred outside the European Economic Area (EEA) or made available to international organizations. If we decide to use the services of suppliers from outside the EEA, the transfer of data will be always based on the decision of the European Commission stating the appropriate level of protection of personal data, and in the absence of such decision, the transfer takes place on the basis of standard contractual clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/ 914 of June 4, 2021 on standard contractual clauses regarding the transfer of personal data to third countries pursuant to the GDPR).

If you want a copy of standard contractual clauses or information about the security measures used in data transfer, please write to the address given in point I.

VI. Catalogue of data subjects' rights

You have the following rights:

- a. to access your personal data,
- b. to correct (rectify) the data,
- c. to have the data erased (unless the criteria provided for in Article 17(3) of GDPR are satisfied),
- d. to restrict the processing,
- e. to data portability,
- f. to file a complaint with the Personal Data Protection Office (in Poland: Prezes Urzędu Ochrony Danych Osobowych).

We would like to point out separately that you have the right to object to the processing if it is based on the so-called legitimate interest of the Controller [Article 6(1)(f) of the GDPR - see the table in point II].

VII. Automated decision making, including profiling

We do not use profiling nor automated decision making, in the processing of personal data.