

## Information clause for individuals conducting correspondence

In connection with fulfilling our obligations under 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), we hereby provide information on the processing of personal data.

### I. Personal Data Controller

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

### II. Data Protection Officer

The Controller is not legally obliged to appoint a data protection officer, but questions relating to personal data processing, if any, may be sent to: [iod@pl.gt.com](mailto:iod@pl.gt.com).

### III. Purposes of personal data processing and legal grounds on which the Controller bases the processing of personal data

No.	Purpose of processing	Legal basis	Period of processing
1.	Recording of correspondence and responding - processing is necessary for legitimate purposes of the Controller consisting in fulfilling timely responses to letters, ensuring the quality of cooperation with contractors and other stakeholders	Pursuant to Article 6 par. 1 item f) of GDPR	Until an effective objection is raised, with due observance of the time limits for possible claims (6 years from the date of termination of contact)
2.	Investigation of claims and defence against claims	Pursuant to Article 6 par. 1 item f) of GDPR	6 years counted from the date of termination of contact

### IV. Data recipients

The Controller may share the personal data with postal operators, state authorities authorised under the law, companies affiliated by capital with the Controller (or other entities affiliated with Grant Thornton International, for internal administrative purposes as well as in instances of transferring the personal data where the entity acts as a subcontractor of the Controller). In addition, the data may be transferred in particular to software providers, IT service providers, administrative support providers, document shredding service providers and data protection consultants.

### V. Transfer of personal data to a third country

As a rule, personal data will not be transferred outside the European Economic Area or made available to international organisations. However, where the Controller uses service providers from outside the EEA, the transfer of data is based on a decision of the European Commission finding an adequate level of protection for personal data, or in the absence of a decision, the transfer is based on the standard contractual clauses adopted by the European Commission, Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council. A copy of the standard contractual clauses and the transfer security measures in place can be obtained from the Personal Data Controller.

### VI. Catalogue of data subjects' rights

You have the following rights in relation to the processing described above:

- a. right of access to the personal data,
- b. rectification of the data,
- c. erasure of the data, in absence of premises from Article 17 par. 3 of GDPR,
- d. restriction of processing,
- e. objection against processing,
- f. data portability,
- g. lodging a complaint with the President of the Personal Data Protection Office, to the extent related to the data processing carried out by the Controller.

At the same time, we would like to point out that the preferred form of contact during the exercise of the above mentioned catalogue of rights is email, addressed to: [iod@pl.gt.com](mailto:iod@pl.gt.com).

#### **VII. Information on automated decision making, including profiling**

There is no profiling, including automated decision making, in the processing of personal data.

