

## Information clause for Correspondents (correspondence, business contacts, offers)

### I. Personal Data Controller (Controller)

Grant Thornton Polska P.S.A. with the registered seat in Poznań, at ul. Abpa A. Baraniaka 88E (61-131 Poznań), entered into the Register of Entrepreneurs under KRS number 0001002477.

### II. Data Protection Officer (DPO)

You can contact the Officer:

- a. by traditional mail to the address specified above,
- b. by electronic mail: [iod@pl.gt.com](mailto:iod@pl.gt.com)

### III. Purposes and legal bases of personal data processing

No.	Purpose of processing	Legal basis	Period of processing
1.	Establishing and maintaining business contacts	Article 6(1)(f) of GDPR  (legitimate interest, which consists in establishing and maintaining business contacts with potential clients in connection with the business activity of the Controller)	Until you submit an effective objection to processing for this purpose.
2.	Presentation of the commercial offer	Article 6(1)(a) of GDPR (consent)	Until you withdraw your consent.
3.	Recording correspondence, responding in a timely manner, and ensuring high-quality cooperation with business partners and other parties involved	Article 6(1)(f) of GDPR  (legitimate interest, which consists of the effective provision of services, efficient business communication and the minimisation of communication errors)	Until you submit an effective objection to processing for this purpose.
4.	Determining, investigating, or defending against claims	Article 6(1)(f) of GDPR  (legitimate interest, which consists in the possibility of establishing, pursuing, or defending against claims arising from business activities, in court and out-of-court proceedings. Data processing is necessary to safeguard the legal interests of the controller and protect its rights)	Six years since the end of the year in which we last had contact with you.
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)  <b>Regarding sensitive data:</b> Article 9(2)(g) of GDPR (substantial public interest, on the basis of EU and Polish law)	For 3 years (in the case of reports related to AML - 5 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.

**Remember!** If you consent to any processing, you may withdraw your consent at any time without any negative consequences. However, any processing carried out prior to the withdrawal of consent will remain lawful.

#### **IV. Source of your data and data categories**

If we have not obtained your personal data directly from you, we have obtained it from: the websites of your employer or the company you represent; public registers (such as CEIDG, KRS); social media platforms used for professional and business networking (such as LinkedIn).

In this way, we obtain information about you such as your first name, surname, position/role, organisation name, field of activity or specialisation, email address and telephone number.

#### **V. 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).

Additionally, we entrust your data in particular to: [companies related to the Controller](#) and entities associated within GTI (if they are service providers to the Controller), software suppliers, entities providing us with IT support, administrative services, document destruction and archiving services, and consultancy services relating to the protection of personal data.

#### **VI. Transfer of personal data to a third country**

We will transfer data outside the European Economic Area (EEA):

- to the United States - due to cooperation with IT solution providers (e.g. software, e-mail, cloud services). The transfer of personal data will be based on Commission Implementing Decision EU 2023/1795 of 10 July 2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate level of protection of personal data under the EU-US Data Privacy Framework.
- to the United Kingdom - due to cooperation with IT solution providers (e.g., software, email, cloud services). The transfer of personal data will be based on Commission Implementing Decision (EU) 2021/1772 of 28 June 2021 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom.

#### **VII. 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 III].

#### **VIII. Automated decision making, including profiling**

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