

**Information on the processing of personal data**  
**for contractors or representatives of contractors, including members of the board of directors, proxies of**  
**contractors or persons designated to be contacted in the course of cooperation with Syntom Metal Recycling**  
**Sp. z o.o.**

<p><b>Who is the controller of personal data?</b></p>	<p>Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 (hereinafter: GDPR), we inform you that the controller of your personal data is <b>Syntom Metal Recycling Sp. z o.o.</b> based in Warsaw (02-672) Domaniewska 17/19/133 str. Poland (hereinafter: Controller).</p> <p>The Controller can be contacted via:</p> <ol style="list-style-type: none"> <li>1. regular mail (by sending correspondence to the Controller's registered office address indicated above),</li> <li>2. email address: <a href="mailto:biuro@syntom.pl">biuro@syntom.pl</a>.</li> </ol> <p>The Controller is responsible for the security of the provided personal data and for processing it in accordance with the law.</p>
<p><b>For what purpose and on what legal basis do we process personal data?</b></p>	<p>Your personal data may be used by the Controller for the following purposes:</p> <ol style="list-style-type: none"> <li>1. execution of activities aimed at concluding or executing a contract with a contractor (legal basis: Article 6(1)(f) GDPR - legitimate interest, and in case the contractor is a natural person: Article 6(1)(b) GDPR - execution of the contract),</li> <li>2. fulfillment of the Controller's legal obligations related to the contract, e.g. maintenance of accounting records (legal basis: Article 6(1)(c) GDPR - legal obligation),</li> <li>3. contacting the contractor's representatives or designated contact persons regarding cooperation (legal basis: Article 6(1)(f) GDPR - legitimate interest),</li> <li>4. investigation or defense against possible claims, related to cooperation, or in connection with the need to prove certain facts, which are important for the Controller in this regard (legal basis: Article 6(1)(f) GDPR - legitimate interest); the time limits for asserting claims under the contract are specified in detail in the Civil Code.</li> </ol> <p>The provision of personal data is voluntary, but necessary for the establishment of cooperation and performance of the contract, as well as for the realization of other purposes of the Controller indicated above. Refusal to provide data may result in the impossibility of cooperation and realization of other indicated purposes.</p>
<p><b>Will the data be subject to profiling?</b></p>	<p>Your personal data will not be used to make decisions based solely on automated processing of personal data, including profiling within the meaning of Article 22 of the GDPR.</p>
<p><b>How long will we use the acquired data?</b></p>	<p>Personal data will be used for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:</p> <ol style="list-style-type: none"> <li>1. The period of cooperation of the contractor with the Controller,</li> <li>2. The statute of limitations for claims related to cooperation, and in the event that your data will constitute evidence</li> </ol>

	<p>in a proceeding conducted under the provisions of law or the Controller becomes aware that they may constitute evidence in the proceedings, this period is extended until the proceedings are legally concluded,</p> <p>3. period until any effective objection is filed.</p>
<p><b>What rights does the person whose data we process have?</b></p>	<p>You have the right to make a request regarding:</p> <ol style="list-style-type: none"> <li>1. access to data (including obtaining information on what data is processed by the Controller and to what extent, as well as obtaining copies of the data) - details: article 15 of the GDPR,</li> <li>2. rectify data (i.e., correct it if the data processed by the Controller is incorrect or incomplete) - details: article 16 of the GDPR,</li> <li>3. deletion of data (if, for example, the data are no longer needed for the purposes for which they were collected or the Controller has no legal basis for processing the data) - details: article 17 of the GDPR,</li> <li>4. limitation of data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data are no longer needed by the Controller, but need to be processed because you are pursuing a claim) - details: article 18 of the GDPR,</li> <li>5. object to the processing of personal data, including profiling (if the personal data is processed on the basis of the legitimate interest of the Controller, or is used for direct marketing purposes) - details: article 21 GDPR,</li> <li>6. transfer of data to another controller (if the processing of data provided to the Controller is carried out by automated means, on the basis of consent or on the basis of a contract) - details: article 20 of GDPR.</li> </ol> <p>In addition, you have the right to lodge a complaint with the President of the Office for Personal Data Protection (supervisory authority) if you believe that the processing of your personal data violates the law (for more information: <a href="https://uodo.gov.pl/pl/83/155">https://uodo.gov.pl/pl/83/155</a>).</p>
<p><b>To whom do we share data?</b></p>	<p>Subject to all data security guarantees, we may transfer your data to other entities, including entities authorized to receive them under applicable laws, entities processing them on our behalf (e.g., technical service providers, hosting providers, analytical service providers, entities providing us with consulting services) and other Controllers (e.g., notary or law firms), including other Elemental Group companies.</p>
<p><b>Do we transfer data outside the European Economic Area (EEA)?</b></p>	<p>If necessary for the purposes indicated above, we may transfer your personal data to our recognized subcontractors or contractors in countries outside the EEA.</p> <p>Considering that the level of protection of personal data in these countries may differ from that provided by the GDPR within the European Union, the transfer of data is carried out with an appropriate degree of protection, primarily by:</p> <ol style="list-style-type: none"> <li>1. cooperation with entities that process personal data in countries outside the EEA for which the European Commission has determined that they provide an adequate level of protection (this includes US companies certified under the approved EU-US Data Protection Framework, such as Microsoft),</li> </ol>

	<p>and in the absence of the aforementioned decision of the European Commission:</p> <ol style="list-style-type: none"> <li>2. The use of standard contractual clauses in contracts with such companies,</li> <li>3. application of binding corporate rules approved by the relevant supervisory authority,</li> <li>4. application of the conditions set forth in Article 49 of the GDPR.</li> </ol> <p>The Controller shall ensure that any transfer of personal data is carried out under appropriate agreements, in a secure and controlled manner.</p> <p>In any of the cases described in paragraphs 2-4 above, you may request further information about the safeguards in place in this regard, obtain a copy of these safeguards and information about the place where they are made available.</p>
<p><b>How can you contact us about data protection issues?</b></p>	<p>In matters related to data protection, you can contact the Controller through:</p> <ol style="list-style-type: none"> <li>1. e-mail address: <a href="mailto:gdpr@elemental.biz">gdpr@elemental.biz</a>.</li> <li>2. of the Controller's mailing address indicated above.</li> </ol>
<p><b>Additional information for representatives of clients, actual beneficiaries or persons designated for contact in the contract.</b></p>	<p>Your personal data has been obtained from a contractor in connection with activities aimed at entering into a contract with the Controller. The data will be processed by the Controller to the extent necessary to execute the contract (i.e. name, surname, position, contact details).</p>