

**Information on processing of personal data
at Syntom Metal Recycling Sp. z o.o. waste collection points**

<p>Who is the controller of personal data?</p>	<p>Pursuant to 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 (hereinafter: GDPR), we inform you that the controller of your personal data is Syntom Metal Recycling Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw (02-672) at Domaniewska Street 17/19 lok. 133 (hereinafter: Controller).</p> <p>The Controller can be contacted via:</p> <ol style="list-style-type: none"> 1. by regular mail (by sending correspondence to the Controller's registered office address indicated above) 2. e-mail address: biuro@syntom.pl. <p>The Controller is responsible for the security of the personal data provided and the processing of the data in accordance with the law.</p>
<p>For what purpose and on what legal basis do we process personal data?</p>	<p>Your personal data may be used by the Controller for the following purposes:</p> <ol style="list-style-type: none"> 1. completion of the relevant documentation (form) related to the acceptance of metal waste and verification of this data with your identity document (legal basis: Article 6(1)(c) of the GDPR - legal obligation), 2. implementation of the Controller's legal obligations related to related to the acceptance of metal waste, in particular obligations the Waste Act of December 14, 2012, tax accounting obligations (legal basis: Article 6(1)(c) GDPR - legal obligation), 3. contact on matters related to the acceptance of metal waste (legal basis: Article 6(1)(f) GDPR - legitimate interest), 4. entering you in our internal customer database to enable efficient search and processing of formalities in case of subsequent metal waste acceptance transactions (legal basis: Article 6(1)(f) GDPR - legitimate interest), 5. conducting data analytics, or optimizing the Controller's processes, e.g. ensuring business continuity and reporting within the Elemental Group (legal basis: Article 6(1)(f) GDPR - legitimate interest), 6. investigating or defending against possible claims, related to the acceptance of metal waste, or in connection with the need to prove certain facts, which are significant for the Controller in this regard (legal basis: Article 6(1)(f) GDPR - legitimate interest). <p>The submission of personal data is voluntary, but necessary for the acceptance of metal waste from you and the fulfillment of other purposes of the Controller indicated above. Refusal to provide data may the inability to accept metal waste and to carry out the other purposes of the Controller indicated above.</p>
<p>Will the data be subject to profiling?</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>How long will we use the acquired data?</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"> 1. period of 5 years counting from the end of the calendar year in which the metal waste was accepted, 2. The statute of limitations for claims arising from the acceptance of metal waste (the time limits for the assertion of claims under the contract are specified in detail in the Civil Code), 3. the period until the final conclusion of the proceedings, if your data will constitute evidence in a proceeding under the law or the Controller became aware that they may constitute evidence in the proceeding, 4. period until any effective objection is filed.
<p>What rights does the person whose data we process have?</p>	<p>You have the right to make a request regarding:</p> <ol style="list-style-type: none"> 1. access to data (including obtaining information on what data is processed by the Controller and to what extent, as well as obtaining a copy of the data) - details: article 15 of the GDPR, 2. rectify data (i.e., correct it if the data processed by the Controller is incorrect or incomplete) - details: article 16 of the GDPR, 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, 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, 5. object to the processing of personal data, including profiling (if 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, <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: https://uodo.gov.pl/pl/83/155).</p>
<p>To whom do we share data?</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 legal offices), including other Elemental Capital Group companies.</p>
<p>Do we transfer data outside the European Economic Area (EEA)?</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 adequate degree of protection, primarily by:</p> <ol style="list-style-type: none"> 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

	<p>(this includes US companies certified under the approved EU-US Data Protection Framework, such as Microsoft),</p> <p>and in the absence of the aforementioned decision of the European Commission:</p> <ol style="list-style-type: none"> 2. The use of standard contractual clauses in contracts with such companies, 3. application of binding corporate rules approved by the relevant supervisory authority, 4. application of the conditions set forth in Article 49 of the GDPR. <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>How can you contact us on matters related to the protection of personal data?</p>	<p>In matters related to data protection, you can contact the Controller through:</p> <ol style="list-style-type: none"> 1. e-mail address: gdpr@elemental.biz. 2. the Controller's mailing address indicated above.