

**Information on the processing of personal data
in handling irregularities process
in Syntom Metal Recycling Sp. z o.o.**

<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 Sp. z o.o. 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"> 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. Receiving, verifying and carrying out investigations of reports of irregularities (violations of law and ethics), in accordance with the procedure adopted in all Elemental Group Companies (legal basis: Article 6(1)(c) GDPR – legal obligation). 2. Keeping an internal register of notifications of irregularities, preparing a report summarizing the activities carried out on a given notification and preparation of an annual report regarding violations in the Elemental Group (legal basis: Article 6(1)(c) of GDPR - legal obligation). 3. Fulfillment of an important public interest related to the handling of whistleblowing, as well as the prevention of violations of the law (legal basis: 9(2)(g) GDPR) - if special category data (e.g., health data) is included in the report or was obtained as part of the investigation. 4. Fulfillment of other legal obligations of the Controller related to the handling of whistleblowing (legal basis: Article 6(1)(c) GDPR - legal obligation). 5. Investigation or defense against possible claims, related to the reporting of irregularities or in connection with the with the need to prove certain facts that are of significant importance to the Controller in this regard (legal basis: Article 6(1)(f) GDPR - legitimate interest). <p>In addition, based on your voluntarily given consent, it is possible to disclose your personal data (including to participants in the investigation) to the extent necessary to carry out the investigation activities (legal basis: art. 6 paragraph 1(a) of the GDPR - consent).</p> <p>Provision of personal data is voluntary, but necessary to accept a report from you regarding irregularities and to carry out other purposes of the Controller indicated above.</p> <p>Refusal to provide data may result in the inability to fulfill the purposes indicated above, in particular, it may result in the inability to identify a</p>

	report of irregularities, especially if it concerns bullying, harassment or discrimination.
How to withdraw consent to data processing?	Withdrawal of consent for the processing of personal data can be done in particular, by contacting the Controller through the contact details indicated in this clause or through a dedicated email address: gdpr@elemental.biz .
Will the data be subject to profiling?	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.
How long will we use the acquired data?	Personal data will be used for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively: <ol style="list-style-type: none"> 1. a period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the completion of the proceedings initiated by these follow-up actions, 2. the period of limitation of claims (the time limits for asserting 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.
What rights does the person whose data we process have?	<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, <p>If the processing is based on consent, you have the right to withdraw your consent at any time by any means.</p> <p>Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.</p> <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>
To whom do we share data?	With all guarantees of data security, we may provide your data to entities authorized to receive them under applicable laws (e.g., police, courts, prosecutor's office) and to other controllers (e.g., notary or legal offices), including other Elemental Capital Group companies.
How can you contact us on matters related to	<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,

related to the protection of personal data?	2. the Controller's mailing address indicated above.
Additional information for persons whose data was obtained by the Controller in the content of the irregularity report.	<p>Your personal data (including identifying data, special categories of data, or data on convictions and criminal acts, if provided) was obtained from the whistleblower or other person participating in the investigation of the whistleblower.</p> <p>Under current law, the identity of the person making the report is anonymous, unless such person has consented to the disclosure of his or her personal information.</p> <p>For more information, visit: gdpr@elemental.biz.</p>