PRIVACY AND COOKIES POLICY

I. DEFINITIONS

Administrator – Kamil Zawierucha, conducting sole proprietorship under the name of Kamil Zawierucha HANOF Mechanical, registered in the Central Register and Information on Economic Activity under the National Business Registry Number (REGON): 522454694, tax identification number (NIP): 7642652765, address: Kwiatkowskiego 4 Street, 52-407 Wrocław.

Personal data – all information about a natural person identified or identifiable by one or more factors specific to physical, physiological, genetic, psychological, economic, cultural or social identity, including device IP, location data, Internet identifier and information collected through cookies and other similar technology.

Policy – this Privacy and Cookies Policy.

GDPR – 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).

Website – the website operated by the Administrator at www.hanof-gms.com

User – any natural person visiting the Website or using one or more of the services or functionalities described in the Policy.

II. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

In connection with the User's activity on the Website, the Administrator collects data to the extent necessary to provide the individual services offered, as well as information on the User's activity on the Website. The detailed principles and purposes of the processing of personal data collected during the use of the Website by the User are described below.

III. PURPOSES AND LEGAL GROUNDS FOR DATA PROCESSING ON THE WEBSITE

- 1. Personal data of Website Users (including IP address or other identifiers and information collected through cookies or other similar technologies), are processed by the Administrator:
 - a) for the purpose of providing services electronically in terms of making available to Users the content collected on the Website the legal basis for processing is the necessity of processing for the performance of the agreement (Article 6 section 1 letter b) of the GDPR);
 - **b**) for analytical and statistical purposes the legal basis for processing is the Administrator's legitimate interest (Article 6 section 1 letter f) of the GDPR) consisting of conducting analyses

- of Users' activities, as well as their preferences in order to improve the applied functionalities and services provided;
- c) for the purposes of possible establishment and investigation of claims or defence against them the legal basis of the processing is the legitimate interest of the Administrator (Article 6 section 1 letter f) of the GDPR) consisting in the protection of his rights.

IV. SOCIAL NETWORKS

The Administrator processes the personal data of Users who visit the Administrator's profiles maintained on social media (Linkedin). This data is processed exclusively in connection with the running of the profile, including for the purpose of informing Users about the Administrator's activities and promoting various events, services and products. The legal basis for the Administrator's processing of personal data for this purpose is the Administrator's legitimate interest (Article 6 section 1 letter f) of the GDPR) in promoting its own brand.

V. COOKIES AND SIMILAR TECHNOLOGY

Cookies are small text files installed on the User's device when browsing the Website. Cookies collect information facilitating website use, for example by remembering a User's visit to the Website and actions performed by him/her.

VI. SERVICE COOKIES

- 1. The Administrator uses so-called "service cookies" primarily to provide the User with services provided electronically and to improve the quality of such services. In this regard, the Administrator and other entities providing analytical and statistical services to the Administrator use cookies to store information or access information already stored in the User's telecommunications terminal equipment (computer, phone, tablet, etc.). Cookies used for this purpose include:
 - a) User input cookies (session ID) for the duration of the session;
 - **b**) authentication cookies used for services which require authentication for the duration of the session:
 - c) user centric security cookies, such as those used for detecting misuse of authentication;
 - **d)** multimedia player session cookies (e.g. flash player cookies);
 - e) persistent user interface customisation cookies, for the duration of the session or slightly longer;
 - f) cookies used for website traffic monitoring, i.e. data analytics, including Google Analytics cookies (cookies used by Google to analyse your use of the Website, to compile statistics and reports on the functioning of the Website). Google does not use the data collected to identify the User, nor does it combine this information to enable identification. Detailed information on the

scope and principles of data collection in connection with this service can be found at the following link:

https://www.google.com/intl/pl/policies/privacy/partners.

VII. PERIOD OF PERSONAL DATA PROCESSING

- 1. The period of data processing by the Administrator depends on the type of service provided and the purpose of processing. As a rule, the User's data are processed for the duration of the use of the Website or correspondence with the User.
- 2. The period of data processing may be extended in the event that the processing is necessary for the establishment and assertion of possible claims or the defence against them, and thereafter only in the event and to the extent required by law. After the expiry of the processing period, the data shall be irreversibly deleted or anonymised

VIII. USER RIGHTS

- 1. The User has the right: to access the content of the data and to request rectification, erasure, restriction of processing, the right to data portability and the right to object to the processing of the data, as well as the right to lodge a complaint with the supervisory authority dealing with the protection of personal data.
- 2. To the extent that the User's data are processed on the basis of consent, you may withdraw your consent at any time by contacting the Administrator, which does not affect the lawfulness of the processing before the withdrawal.
- 3. The User has the right to object to the processing of data for marketing purposes, if the processing is carried out in connection with the legitimate interest of the Administrator, as well as for reasons related to the User's particular situation in other cases when the legal basis of data processing is the legitimate interest of the Administrator (e.g. in connection with the realisation of analytical and statistical purposes).

IX. RECIPIENTS OF THE DATA

- 1. In connection with the provision of services, personal data will be disclosed to external entities, including in particular suppliers responsible for the operation of IT systems.
- **2.** The Administrator reserves the right to disclose selected information concerning the User to the competent authorities or to third parties who make a request for such information on the basis of the relevant legal basis and in accordance with the provisions of the applicable law.

X. SECURITY OF PERSONAL DATA

- 1. The Administrator shall on an ongoing basis conduct a risk analysis to ensure that personal data are processed by him in a secure manner ensuring in particular that only authorised persons have access to the data and only to the extent necessary for the performance of their tasks. The Administrator shall ensure that all operations on personal data are recorded and carried out only by authorised employees and associates.
- 2. The Administrator shall take all necessary measures to ensure that also his subcontractors and other cooperating entities guarantee the application of appropriate security measures whenever they process personal data on behalf of the Administrator.

XI. CONTACT DETAILS

Contact with the Administrator is possible via e-mail address: office@hanof-gms.com or the correspondence address: Kwiatkowskiego 4 Street, 52-407 Wrocław.

XII. CHANGES TO THE PRIVACY AND COOKIES POLICY

The Policy shall be reviewed on an ongoing basis and updated as necessary. The current version of the Policy has been adopted and is effective as of 10 November 2022.