

## **Information on processing of personal data of natural persons who are contractors or potential contractors, as well as natural persons representing contractors or potential contractors**

Pursuant to the provision of Article 13(1) and (2) of the 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 ("GDPR"), Cross Poland Sp. z o.o. with its registered office in Zakręt, Trakt Brzeski 1 Street (05-077 Warszawa Wesola), with the following REGON number: 014916840, NIP number: 5242271550 KRS number: 0000053921 (info@crossjeans.pl) ("Cross"), informs you that it processes personal data of natural persons who are contractors or potential contractors, as well as natural persons representing contractors or potential contractors.

Details of the processing of this personal data are set out below.

### **1. Personal data controller**

The Controller of the personal data is Cross with its registered office in Zakręt, Trakt Brzeski 1 Street (05-077 Warszawa Wesola), with the following REGON number: 017427662, NIP number: 1181624643 and KRS number: 0000092741. (e-mail address: info@crossjeans.pl).

### **2. Information on the Data Protection Officer**

In Cross, based in Zakręt, no personal data protection officer has been appointed within the meaning of Chapter IV, Section 4 of the GDPR.

### **3. Purposes and basis of processing of personal data**

The personal data will be processed for:

- a) Article 6(1)(b) of the GDPR, because it is necessary for conclusion or implementation of the Contract,
- b) Article 6(1)(c) of the GDPR, because it is necessary for fulfilling of the legal obligations imposed on Cross, or
- c) Article 6(1)(f) of the GDPR, because it is necessary due to the legally justified Cross's interest, which is identification, seeking or protection of the claims until the date of their expiration or until the finalization or the relevant proceedings, provided that have been initiated during said period.

### **4. Processing of data outside the EEA**

Personal data will be transferred to recipients located in countries outside the European Economic Area (EEA) due to the possible use of IT solutions based on cloud solutions or serviced by a service center located outside the EEA. Cross will provide a mechanism legalizing the transfer in accordance with European Union law and ensuring guarantees for the protection of personal data. We inform about the potential risk associated with the transfer of personal data outside the European Economic Area, in particular the lack of an adequate level of protection in some countries.

### **5. Recipients of data processed by Cross**

The personal data may be transferred:

- a) entities involved in the development of the company (e.g. law firms, auditing companies),
- b) institutions as defined by law,

c) our subcontractors and service providers (processors).

## **6. Period of data storage**

Personal data will be processed for a period related to the fulfilment of the processing purposes indicated in point. 3 purposes of processing. In view of the above, the personal data shall be processed for the period of limitation of potential claims which may arise from the concluded agreement, and in the case the agreement has not been concluded, for the time until talks on its conclusion are finished.

## **7. Rights of the data subject whose personal data is processed**

Under the GDPR, data subjects have the following rights in relation to their personal data:

- a) access the content of their personal data and to receive a copy or to transfer thereof;
- b) rectify (amend) their data;
- c) erase - if, in the opinion of the person whose personal data is being processed, there are no grounds for Cross to process the personal data, the person may request that Cross erase the data;
- d) restrict processing - the person whose personal data is being processed may request that Cross restrict the processing of that personal data to only storing or taking agreed actions;
- e) object at any time to the processing of personal data. Upon receipt of an objection, Cross will cease processing for the purpose or purposes to which the objection has been raised, unless the Company demonstrates that there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or grounds for establishing, asserting or defending against claims;
- f) lodge a complaint with the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw) or another competent authority if they consider that the processing of their personal data breaches the regulations resulting from the GDPR;

## **8. Information about whether the data is required or voluntary**

The provision of personal data is voluntary but necessary for the identification, conclusion and execution of contracts.

## **9. Automated decision-making**

Please be informed that we process the data by automated means, however, it is not subject to profiling and automated decision-making is not used.

## **10. Personal data of the natural persons representing contractors or potential contractors**

Where the personal data of the natural persons representing contractors or potential contractors is provided for Cross's processing not by the said persons, pursuant to the Article 14 (1) and (2) of GDPR we inform that in such circumstances the represented contractor is the source of the said data or the foregoing has been obtained from National Companies Register and the following personal data categories are processing: a) name, b) surname, c) function performed for the contractor, which gives grounds for the representation entitlement, d) PESEL number, if provided by the contractor.