

Information

for contractors and their representatives, proxies, employees and other persons indicated in concluded contracts or contacted in connection with their implementation, regarding the fulfilment of obligations arising from Art. 13(1) and (2) of the General Data Protection Regulation of April 27, 2016. (GDPR)¹.

I. **Joint Controllers**

The Controller of your personal data is Euroafrica Services Limited (Spółka z o. o.) Branch in Poland, ul. Energetyków 3/4, 70-952 Szczecin and other entities belonging to the Hass Holding Limited Capital Group, all with headquarters at Meliza Court 4 th floor 229, Arch. Makariou III Avenue 3105 Limassol, Cyprus (Joint Controllers).

The Joint Controllers jointly determine the methods and purposes of personal data processing and pursue economic interests. In order to ensure proper protection of your rights and freedoms in the field of personal data processing, the Joint Controllers, pursuant to Art. 26 of the GDPR, have concluded an agreement comprehensively and transparently regulating their mutual relations, mainly in the scope of fulfilling their obligations towards data subjects. For detailed information please contact us the following address: at rodo@euroafrica.com.pl.

II. Contact details

The Joint Controllers have not appointed a data protection officer. However, in all matters relating to the processing of your personal data and the exercise of your rights, you can contact the Data Protection Representative appointed by the Joint Controllers, available at: ul. Energetyków 3/4, 70-952 Szczecin or e-mail: rodo@euroafrica.com.pl or by phone: (+48 91) 814-34-00.

III. Purposes and legal basis for data processing

- 1. Implementation of the legally justified interest of the Joint Controllers (Art. 6 section 1 letter f of the GDPR), i.e.:
- a) implementation of the contract concluded with your employer, or the entity you represent, or the entity for which you act as a partner, collaborator, advisor or subcontractor, in particular documenting the conclusion of the contract and identifying persons authorized to perform the activities specified therein and ensuring the security of confidential information enterprises;
- b) determining and pursuing possible claims or defense against claims related to the implementation of the contract indicated in point 1a);

^{1 1} Regulation (EU) 2016/679 of the European Parliament and 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 - GDPR).



- c) maintaining our relationships and building a positive image of the Joint Controllers by sending occasional correspondence, e.g. on the occasion of holidays, anniversaries, promotion of services, etc.
- 2. In cases where you are a party to a commercial contract concluded with us as a natural person, your personal data will be processed for the purpose of its implementation or to take action at your request before concluding the contract (Art. 6 section 1 letter b of the GDPR).
- 3. Fulfilment of the legal obligation imposed on the Joint Controllers, in particular in the field of tax law and accounting (Art. 6 section 1 letter c of the GDPR).

IV. **Data recipients**

Your personal data may be made available to entities providing the Joint Controllers with services in the field of: administration and servicing of IT systems, communications, hosting, mail, banking, legal advice, insurance, document destruction, crew management, forwarding and maritime transport, and other entities, if it is necessary for the implementation of contracts. In addition, your data may be disclosed to public authorities only if an appropriate legal basis is indicated.

٧. Transferring data to a third country

Due to the nature of the business activities of the Joint Controllers, your personal data may sometimes be transferred to a third country, i.e. outside the European Economic Area. In these cases, the transfer of data will take place on the basis of the principles set out in Chapter V of the GDPR, in particular on the basis of the decision of the European Commission confirming the adequate level of protection (Art. 45 of the GDPR), and in the absence of an appropriate decision, on the basis of standard data protection clauses (Art. 46 section 2, letter c of the GDPR), or based on one of the exceptions listed in Art. 49 section 1 of the GDPR, while maintaining the specific requirements indicated therein.

You have the right to obtain a copy of the personal data transferred. For this purpose, you can contact the designated Data Protection Representative or directly the relevant Joint Controller

VI. Data storage period

- Data processed for the purpose indicated in point III.1. will be stored until the purpose is achieved or a justified objection is raised, but no longer than until the claims expire.
- Data processed for the purpose specified in point. III.2. will be stored for the duration of the contract.
 - Data processed for the purpose indicated in point. III.3. will be stored for the periods indicated in the relevant special provisions.
 - Sometimes the specified storage periods for your data may be appropriately and necessary extended in the event of any claims and court proceedings - by the duration of these proceedings and their settlement - and also if the law obliges us to process them longer in certain cases.



VII. Information about your rights

You have the following rights:

- ✓ access to the content of your data, including obtaining a copy thereof,
- ✓ rectification and supplementation of data,
- √ deletion of data,
- √ limiting the processing of your data,
- √ data transfer in cases where processing is carried out in an automated manner,
- ✓ raise an objection at any time due to your particular situation related to the processing of personal

data pursuant to Article 6 section 1 letter f of GDPR,

- ✓ submit a complaint to the President of the Office for Personal Data Protection or a supervisory authority in another country, according to the jurisdiction specified in Article 4 point 22 of the GDPR,
- ✓ withdraw consent to their processing at any time without affecting the lawfulness of processing based on consent before its withdrawal,
- ✓ contact with the Data Protection Representative in all matters related to the processing of personal data and the implementation of the above rights.
- regardless of the arrangements indicated in the agreement between the Joint Controllers, you can exercise your rights towards each of them.

When exercising your rights, the Joint Controllers will take into account the limitations resulting from the GDPR and other legal provisions.

VIII. Information regarding the need to provide data and possible consequences of failure to provide it

Providing data is voluntary, but refusing to provide it may make our cooperation difficult or even impossible.

IX. Information about automated decision-making

The Joint Controllers do not process personal data in an automated manner, including in the form of profiling, i.e. they do not automatically assess some of your personal factors.