

# Information for the employee, regarding the implementation of obligations arising from Art. 13(1) and (2) of the General Data Protection Regulation of April 27, 2016. (GDPR)<sup>1</sup>.

#### 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 at the following e-mail address: 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. Performance of an employment contract or other form of employment or to take action at your reguest before concluding the contract (Art. 6 section 1 letter b of the GDPR).
- 2. Fulfilment of legal obligations incumbent on the Joint Controllers, in particular in the field of labour law, social security law, tax law and accounting (Art. 6 section 1 letter c of the GDPR).
- 3. Fulfilling the obligations and specific rights of the Joint Controllers in the field of labour law, social security and social protection (Art. 9 section 2 letter b of the GDPR).
- 4. Implementation of the legally justified interests of the Joint Controllers (Art. 6 section 1 letter f of the GDPR), consisting in:

<sup>&</sup>lt;sup>1</sup> 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).



- a) performance of contracts with contractors for the supply of goods or services, in particular documenting the conclusion of the contract and identifying persons authorized to perform the activities specified therein and ensuring the security of information constituting a business secret,
- b) pursuing possible claims or defending against claims related to the implementation of the employment contract;
- 5. Sometimes data may be processed pursuant to Art. 6 section 1 letter a of GDPR, i.e. based on your voluntary consent, expressed each time for the purpose and to the extent indicated in its content.

## 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, running Employee Capital Plans, auditing, transport, hotel management, document destruction, crew management, forwarding and maritime transport and other entities, if necessary for the implementation of contracts. In addition, your data may be disclosed to public authorities only if an appropriate legal basis is indicated.

## V. 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

- 1. Data processed for the purpose specified in point. III.1., if the Joint Controllers pay social security contributions to ZUS, they will be stored for 10 or 50 years, depending on the conditions met and taking into account exceptions, in particular those specified in the relevant provisions of the Labor Code Act and the Pensions and Pensions Act from the Social Insurance Fund, and in other cases for 5 years, counting from January 1 of the year following the end of cooperation.
- 2. Data processed for the purposes indicated in point. III.2. and III.3. will be stored for the periods indicated in the relevant special provisions.
- 3. Data processed for the purpose indicated in point III.4. will be stored until the purpose is achieved or a justified objection is raised, but no longer than until the claims expire.



4. Data processed for the purpose specified in point. III.5. will be stored until the purpose is achieved or you withdraw your consent.

# 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

To establish an employment relationship, providing data is mandatory and results from legal provisions, in particular the Labor Code Act. In the remaining scope, providing data is voluntary, but refusing to provide it will prevent the achievement of the goal. In the part regarding consent, providing data is voluntary and any lack of consent will not result in any negative consequences for the Joint Controller.

#### 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.