

## GDPR INFORMATION OBLIGATIONS

As of 25 May 2018, 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”) is in force. In order to provide information on how your personal data is processed by EULEO Group companies, we provide the following necessary information in this regard, thus fulfilling the information obligation. The basis for this is 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 (“GDPR”), effective since 25 May 2018 in the European Economic Area.

Your personal data is processed mainly for the purpose of establishing or maintaining a business relationship between you and EULEO Group companies, for direct marketing of the products or services of these companies, and for sending commercial information. The legal basis for processing your personal data is Article 6(a), (b), (c), (f) GDPR.

The Controllers of your personal data are the companies of the EULEO Group, which includes the following entities:

- EULEO G. Grzesiak spółka komandytowa, NIP 9451946623
- Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa NIP 9452052460
- EULEO SSC sp. z o.o. NIP 9452166146

with their seats at: Kraków 31-231, ul. Bociana 22.

The abbreviated name EULEO refers to each of the above entities.

Your personal data is processed mainly for the purpose of establishing or maintaining a business relationship between you and EULEO Group companies, for direct marketing of products or services of these companies, and for sending commercial information. The legal basis for processing your personal data is Article 6(a), (b), (c), (f) GDPR.

## PRIVACY POLICY

In order to exercise the utmost care in observing the principle of transparency, we also present the specific part of the Privacy Policy where we include information clauses for individual categories of data subjects in order to fulfil the information obligations, separately for the Debt Collection Company and the Law Firm.

At EULEO Group, we care about your personal data. The privacy notice explains the types of personal data we collect, how and why we collect and use it, and how long we keep it. We also explain your rights to access, rectify or object to the processing of that data (including requesting erasure, as applicable). This policy applies to Clients, third parties, and stakeholders who visit our websites.

### 1. Is EULEO a “data Controller”?

Yes, EULEO is a “data Controller” as defined by the applicable legislation (GDPR). This means that EULEO is the legal entity that decides the purposes for which it collects data and manages the personal data it collects, and is required by law to establish policies, processes and procedures to protect that data and respect the rights of data subjects.

### 2. What kind of personal data does EULEO collect?

Depending on the information provided or preferences selected, EULEO may collect the following categories of personal data:

- a) Data you provide to us, eg during registration for our services, such as your name, email address, telephone number, position, company name.
- b) If you visit our website, we collect information using cookies. We use cookies to provide you with a user-friendly, safe and effective website and to offer you services tailored to your needs and interests, eg by adapting them to your browser experience or by providing targeted (third party) advertising.
- c) Information that we obtain from third parties (eg information providers) or from officially available sources (eg business records).

3) For what purpose and on what legal basis does EULEO use your personal data?

We use your data:

- a) on the basis of your consent to:
  - i) provide, maintain, improve and develop our services and adapt them to your needs and interests (eg to offer you personalised advertising),
  - ii) contact you,
  - iii) inform and advise you about EULEO products (eg by sending you advertisements),
- b) for the preparation and/or performance of a contract with you, in order to:
  - i) prepare offers for one of our products, providing you with our services and fulfilling our mutual contractual obligations,
  - ii) set up and maintain user accounts in our online systems and platforms,
  - iii) provide technical support or other related purposes,
- c) as part of our legal interest in the scope of:
  - i) providing, maintaining, improving and developing our services and tailoring them to your needs and interests (eg to offer you personalised advertising),
  - ii) improving the security of EULEO's IT systems for the benefit of all our users,
  - iii) contacting you,
- d) to comply with legal requirements for law enforcement requests or disclosure procedures or, if required by applicable law, court orders, orders of government or governmental authorities; as necessary to investigate, prevent, or take measures regarding illegal activity, alleged fraud, situations posing a potential threat to the safety of individuals, or violations of our policies or terms and conditions,
- e) to protect and assert our claims.

If we use your data for purposes other than those set out in this policy, we will inform you of that other purpose and obtain your consent, if required.

4) Where will your personal data be processed?

Personal data collected by EULEO may be processed both inside and outside the European Economic Area ("EEA"), subject always to contractual confidentiality and security restrictions in accordance with applicable data protection laws. We will not disclose your personal data to parties who are not authorised to process it. Whenever we transfer your personal data for processing outside the EEA, we will implement effective transfer mechanisms (eg EU standard contractual clauses or binding corporate rules) to ensure an adequate level of data protection.

5) How long will we store your personal data?

We will not store your personal data longer than necessary to fulfil the purposes for which it was collected or to comply with obligations imposed by law or, to the extent permitted by law, eg to secure claims. After this time, we will delete your personal data. Individual retention periods depend on the type of personal data and the specific purpose of its processing.

6) What are your rights regarding your personal data?

To the extent permitted by applicable data protection legislation, you have the right to:

- a) access the personal data concerning you, including information such as, for example, the sources and categories of data, the purposes of the processing, the recipients (or categories of recipients), and the corresponding retention period;
- b) request that your personal data be updated or rectified so that it is always accurate;
- c) obtain your personal data in electronic format for you or for another Controller;
- d) request the erasure of your personal data if they are no longer necessary for the purposes for which they were collected or otherwise processed;
- e) restrict the processing of your personal data in certain circumstances, for example if you have contested the accuracy of personal data concerning you, for a period allowing us to verify its accuracy;

- f) object to the processing of your personal data on the basis of specific reasons relating to your special situation which override our legitimate legal grounds for processing;
- g) withdraw consent at any time where your personal data are processed with your consent, without affecting the lawfulness of processing based on consent before its withdrawal or if there is another legal basis for processing your data (eg an overriding legal interest);
- h) lodge a complaint with the Controller and/or Data Protection Authority [PL: Urząd Ochrony Danych Osobowych].
- i) exercise your rights by contacting us and stating your name and email address and the purpose of your request.

7) How does EULEO collect personal data through its websites?

On its websites, EULEO only collects personal data that you voluntarily provide in online forms or otherwise allow us to collect in accordance with the cookie preferences you selected when you first visited our website. You have the right to withdraw your consent at any time, and if you do so, we will stop processing data relating to you collected on this website. You may withdraw your consent by writing to us at the following email address [rodo@euleo.pl](mailto:rodo@euleo.pl)

8) What are cookies?

A cookie is a small piece of data stored on your computer or mobile device that enables a website to “remember” your actions or preferences. We use cookies to ensure that our websites work properly and make it easier for you to access them by collecting information about your device and preferences (eg your browser). In addition, we collect information about the interaction between you and our services or the services of our partners, such as advertising services. In principle, you can also use our website without cookies. However, if you wish to use our website fully and conveniently, you should accept these cookies. We use the following cookies on our website:

Name of cookie	Use	Storage time	Type of cookie
Google Analytics	Google Analytics cookies for tracking website hits	3 years	Third party cookies

9) Does EULEO collect and process your personal data from third parties?

Yes. When providing receivables management and legal assistance solutions to our clients, we may collect information about you and your business in order to assess and monitor our own receivables loss and debt recovery risk. We collect information from third parties or officially available sources. In addition, we may collect information that you provide to us directly. We collect data related to:

- a) business entities, including sole traders: industry, name, names of representatives (eg directors, officers), names of owners, and information on creditworthiness (eg payments and risk incidents),
- b) natural persons: name, email address, address, information concerning your creditworthiness (eg payments and risk incidents).

10) How can you contact us?

If you have any questions about the personal data that concerns you, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl)

11) How often do we update the privacy notice?

We will review this privacy notice every 6 months and make changes if necessary. We will ensure that the latest version is available here and we may also notify you directly (eg via email) if there are significant changes. This privacy notice was last updated on 08.03.2021.

## Disclosure clauses of EULEO G. Grzesiak spółka komandytowa

### For itself

#### Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for Clients (creditors)

1. **Controller.** The Controller of your personal data is EULEO G. Grzesiak spółka komandytowa with the seat in Kraków, ul. Bociana 22. Regarding the protection of your personal data, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing at the seat address of the Controller.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(b) GDPR, for the conclusion and performance of the contract,
  - 2.2. Article 6(1)(f) GDPR, ie in legitimate interest, for the purposes of any claim or defence, fraud prevention, and ensuring the security of networks and systems, for administrative purposes of Euleo group companies, for marketing purposes through traditional channels for the duration of the relationship between us,
  - 2.3. Article 6(1)(c) GDPR, in order to fulfil tax, balance sheet obligations resulting from the legislation,
  - 2.4. Article 6(1)(a) GDPR, ie your consent, for the marketing and promotion of its services, using the communication channel under your consent.
  - 2.5. In order to perform the contract, the Controller also processes personal data of persons employed by the Client assigned for contact / performance of the contract, where the legal relationship between that person and the Controller's Client is the legal basis of such processing.
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share your data with recipients having the status of a separate Controller, which may include other legal advisers, attorneys, notaries, auditors, patent attorneys, and other regulated professions or public trust professions whose purposes and means of processing are defined by common law. In accordance with recital 48 of the GDPR, data may be shared with Euleo group companies for internal administrative purposes.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 5.1. on the basis of the necessity to perform a contract: until the completion of the contract,
  - 5.2. on the basis of a legitimate interest: until the lodging of an effective objection, within the statute of limitations for claims of 10 years, or the expiry of another legitimate interest,
  - 5.3. on the basis of legal obligations: for the period set out in these regulations,
  - 5.4. on the basis of consent: until you withdraw your consent.
6. **Legitimate interest.** The legitimate interests pursued by the Controller include the possibility to defend and assert claims, fraud prevention, ensuring network and system security, administrative purposes of Euleo group companies.
7. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to ensure the performance of the rights granted in general, because it may depend on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
8. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.
9. **Consent and information about the possibility of withdrawing consent.** You have the right to withdraw your consent to the processing of your personal data at any time, but withdrawal of consent

does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal. You can withdraw your consent by sending a statement to the following address: bok@euleo.pl

10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Provision of data.** The provision of data is a condition for the conclusion and implementation of the contract.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for the Debtor after the assignment of the debt.**

1. **Controller.** The Controller of your personal data is EULEO G. Grzesiak spółka komandytowa, ul. Bociana 22, 31-231 Kraków. In matters related to the protection of your personal data you can make contact at the following email address [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing at the address of the Controller's seat.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(f) GDPR, ie legitimate interest, in order to assert a claim.
  - 2.2. For the above purpose, on the basis stated above, the Controller may also process personal data of persons employed by the Debtor or its representatives.
3. **Categories of data.** The Controller collects the following categories of personal data: identification data, contact data, financial and asset situation.
4. **Recipients.** For the above purposes, the Controller may outsource the processing of your data to third parties, such as debt collection companies, debt exchanges, or may make the data available to entities that have the status of a separate Controller, such as law firms of legal advisers / attorneys. Such a recipient of your data is the giełda-długów.net portal.
5. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
6. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 6.1. on the basis of a legitimate interest: until an effective objection is lodged or the statute of limitations has expired.
7. **Legitimate interest.** The legitimate interest pursued by the Controller is the possibility to assert claims.
8. **Rights of the data subject.** You have the right to access your data and receive a copy of it, to rectify (amend) your data, to erase, restrict or object to its processing, to data portability, to lodge a complaint with a supervisory authority.
9. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.
10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Source of data.** The Controller obtained your personal data from the assignor (previous creditor), from whom, by way of assignment, he purchased the claim to which you are a debtor. The Controller may collect and use your personal data (contact, identification, financial and asset situation) also in a manner other than when received from you, in particular from publicly available registers, such as KRS and CEIDG.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for potential debt buyers.**

1. **Controller.** The Controller of your personal data is EULEO G. Grzesiak spółka komandytowa with the seat in Kraków, ul. Bociana 22. Regarding the protection of your personal data, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl) or writing at the Controller's seat address.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(a) GDPR, ie your implied consent, including a communication channel within the meaning of the act on the provision of electronic services and of the telecommunications law, in order to make an offer for the sale of claims which, in view of your business activity, may be of interest to you, also in view of the person of the debtor of this claim, who may be your creditor, thus enabling a set-off.
  - 2.2. In order to perform the contract, the Controller also processes the personal data of the persons employed by you intended for contact, the legal relationship linking that person to you being the legal basis of such processing.
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share your data with recipients having the status of a separate Controller, which may include other legal advisers, attorneys, notaries, auditors, patent attorneys and other regulated professions or public trust professions whose purposes and means of processing are defined by common law. In accordance with recital 48 of the GDPR, for internal administrative purposes, data may be shared with Euleo group companies.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of retention limitation, only for the time necessary to achieve the purpose with a legitimate basis. In this case, until you withdraw your consent.
6. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to exercise the rights granted in general, because their exercise depends on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
7. **Consent and information on how to withdraw consent.** You have the right to withdraw your consent to the processing of your personal data at any time, but withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal. You can withdraw your consent by sending a statement to: [rodo@euleo.pl](mailto:rodo@euleo.pl)
8. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to complain to the supervisory authority: the President of the Office for Personal Data Protection.
9. **Provision of data.** The provision of data is voluntary.
10. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for the Debtor after the completion of the ordered recovery.**

1. **Controller.** The Controller of your personal data is EULEO G. Grzesiak spółka komandytowa, ul. Bociana 22, 31-231 Kraków. In matters related to the protection of your personal data you can make contact at the following email address [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing at the address of the Controller's seat.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(f) GDPR, ie legitimate interest to assert and defend against claims.
  - 2.2. For the above purpose, on the basis stated above, the Controller may also process personal data of persons employed by the Debtor or his representatives.
3. **Categories of data.** The Controller stores the following categories of personal data: identification, contact, financial and asset situation.
4. **Recipients.** For the above purposes, the Controller may outsource the processing of your data to third parties such as IT service providers or share your data with entities that have the status of a separate Controller such as law firms of solicitors / barristers.
5. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
6. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 6.1. on the basis of a legitimate interest: until an effective objection is lodged or the statute of limitations for tort claims, pursuant to Article 442(1) of the Civil Code, has expired for 10 years.
7. **Legitimate interest.** The legitimate interest pursued by the Controller is the possibility to defend and assert claims.
8. **Rights of the data subject.** You have the right to access your data and receive a copy of it, to rectify (amend) your data, to erase, restrict or object to its processing, to data portability, to lodge a complaint with a supervisory authority.
9. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.
10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Source of data.** The Controller has obtained personal data from your creditor, as well as from publicly available registers, such as KRS and CEIDG, in order to carry out the debt collection.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

## **Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for the Employee.**

1. **Controller.** The Controller of your personal data is Kancelaria EULEO G. Grzesiak spółka komandytowa, ul. Bociana 22, 31-231 Kraków. In the matter of the protection of your personal data you may contact at the email address [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing to the address of the seat of the Law Firm.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(b) GDPR, for the conclusion and performance of the contract, which also includes the use of the employee's personal data for business contacts with contractors,
  - 2.2. Article 6(1)(f) GDPR, ie legitimate interest, for the purposes of possible claim or defence, organisation of working time and evaluation of work, fraud prevention and ensuring network and system security, for administrative purposes of EULEO group companies,
  - 2.3. Article 6(1)(c) GDPR, in order to fulfil tax, balance sheet, labour law and social security obligations, for initial and periodic examinations, to ensure proper OSH conditions,
  - 2.4. Article 6(1)(a) GDPR (consent) in order, for example, to use your image for external purposes (for example on a website).
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share data with recipients having the status of a separate Controller, such as solicitors, barristers, notaries, auditors, patent attorneys, medical professionals and other regulated professions or professions of public trust whose purposes and means of processing are defined by common law.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 5.1. on the basis of the necessity to perform a contract: until the completion of the contract,
  - 5.2. on the basis of legitimate interests: in the case of data not included in employee records, until the expiry of the statute of limitations on claims, ie in the case of employment relationships 3 years from the due date, in the case of non-employee relationships 10 years, or the expiry of other legitimate interests, eg the email account will be archived for a period of one year after the termination of the employment relationship, for the sole purpose of sending an automatic reply informing senders that the employee's email account is not active, or until effective objection is made,
  - 5.3. on the basis of obligations resulting from the regulations – for the time stated in these regulations, the employee's personal files are kept for 10 years from the end of the calendar year in which the employment relationship was terminated or expired, in the case of employees hired before 1 January 1999 and after 1 January 1999 and before 1 January 2019 and in relation to whom the employer has not submitted a statement on the intention to provide an information report for these persons – for a period of 50 years.
6. **Legitimate interest.** The legitimate interests pursued by the Controller are the possibility of defending and asserting claims, organising working time and performance evaluation, preventing fraud and ensuring network and system security.
7. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to ensure the performance of the rights granted in general, because it may depend on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
8. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.

9. **Consent and information about the possibility of withdrawing consent.** You have the right to withdraw your consent to the processing of your personal data at any time, but withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.
10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Provision of data.** The provision of data for purposes based on your consent is voluntary, otherwise it is a condition for the conclusion and implementation of the contract.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for the Job Candidate.**

1. **Controller.** The Controller of your personal data is Kancelaria EULEO G. Grzesiak spółka komandytowa, ul. Bociana 22, 31-231 Kraków. In the matter of the protection of your personal data you may contact at the email address [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing to the address of the seat of the Law Firm.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(b) GDPR, for the purpose of recruitment,
  - 2.2. Article 6(1)(a) GDPR, in the event that you consent to the use of your data for future recruitment, or in the event that you include information in your CV that goes beyond the catalogue stated in Article 22(1) paragraph 1 of the Labour Code.
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share data with recipients having the status of a separate controller, such as legal advisers, attorneys, notaries, auditors, patent attorneys and other representatives of regulated professions or professions of public trust, whose purposes and means of processing are defined by common law.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of retention limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 5.1. on the basis of necessity for the performance of pre-contractual activities (recruitment): after completion of the recruitment,
  - 5.2. on the basis of consent to use the data in future recruitments: until the withdrawal of consent or the expiry of a period of 12 months from the submission of the CV,
6. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to exercise the rights granted in general, because their exercise depends on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
7. **Consent and information on how to withdraw consent.** You have the right to withdraw your consent to the processing of personal data at any time, but withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.
8. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to complain to the supervisory authority: the President of the Office for Personal Data Protection.
9. **Provision of data.** The provision of data for purposes based on your consent is voluntary, otherwise it is a condition for participation in the recruitment.
10. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

## On behalf of the creditor

### Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – on behalf of the Creditor for the Debtor whose debt has been published on the unpaid.info portal.

1. **Controller.** The Controller of your personal data is the Creditor publishing the debt on the niezaplacone.info portal.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(f) GDPR, ie legitimate interest, for the purpose of selling the debt.
3. **Categories of data.** The Controller collects the following categories of personal data: identification, contact, financial and asset situation.
4. **Recipients.** For the purposes referred to above, the Controller shall outsource your personal data to a recipient which is the operator of the niezaplacone.info portal: EULEO G. Grzesiak spółka komandytowa with the seat in Kraków at ul. Bociana 22.
5. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
6. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 6.1. on the basis of a legitimate interest: until an effective objection is lodged or the statute of limitations expires.
7. **Legitimate interest.** The legitimate interest pursued by the Controller is the possibility of asserting the claim by selling it.
8. **Rights of the data subject.** You have the right to access your data and receive a copy of it, to rectify (amend) your data, to erase, restrict or object to its processing, to data portability, to lodge a complaint with a supervisory authority.
9. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.
10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Source of data.** The Controller can collect and use your personal data (contact, identification, financial situation) also in a manner other than following receiving from you, in particular from publicly available registers, such as KRS and CEIDG.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – on behalf of the Creditor for the Debtor and other persons whose data are processed for the purposes of debt recovery.**

1. **Controller.** The Controller of your personal data is the Creditor named in the header of the demand for payment which we have sent to you on his behalf.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(f) GDPR, ie legitimate interest, in order to assert a claim.
  - 2.2. For the above purpose, on the basis stated above, the Controller may also process personal data of persons employed by the Debtor or its representatives.
3. **Categories of data.** The Controller collects the following categories of personal data: identification, contact, financial and asset situation.
4. **Recipients.** For the above purposes, the Controller may outsource the processing of your data to third parties, such as debt collection agencies, debt exchanges, or make the data available to entities that have the status of separate controllers, such as law firms/attorneys' offices. Such recipient of your data is the debt collection company Euleo, as well as the giełda-długów.net portal.
5. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
6. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 6.1. on the basis of a legitimate interest: until an effective objection is lodged or the statute of limitations has expired.
7. **Legitimate interest.** The legitimate interest pursued by the Controller is the possibility to assert claims.
8. **Rights of the data subject.** You have the right to access your data and receive a copy of it, to rectify (amend) your data, to erase, restrict or object to its processing, to data portability, to lodge a complaint with a supervisory authority.
9. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.
10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Source of data.** The Controller can collect and use your personal data (contact, identification, financial situation) also in a manner other than when received from you, in particular from publicly available registers, such as KRS and CEIDG.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

## Information clauses of Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa

### Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for Clients.

1. **Controller.** The Controller of your personal data is Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa, ul. Bociana 22, 31- 231 Kraków. Regarding the protection of your personal data, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing to the address of the seat of Kancelaria.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(b) GDPR, for the conclusion and performance of the contract,
  - 2.2. Article 6(1)(f) GDPR, ie legitimate interest, for the purposes of a possible claim or defence, to prevent fraud and to ensure the security of networks and systems, for administrative purposes of Euleo companies,
  - 2.3. Article 6(1)(c) GDPR, in order to fulfil tax, balance sheet obligations resulting from the legislation. In the situation when we provide legal assistance ex officio, the legal basis for the processing of personal data, are the applicable regulations.
  - 2.4. In order to perform the contract, the Controller also processes personal data of persons employed by the Client intended for contact/performance of the contract, the legal basis legalizing such processing being the legal relationship between that person and the Controller's Client.
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share the data with recipients having the status of a separate Controller, in relation to the specificity of the service provided, these may include other legal advisers, attorneys, notaries, auditors, patent attorneys and other representatives of regulated professions or professions of public trust, whose purposes and means of processing are defined by common law. In accordance with recital 48 of the GDPR, for internal administrative purposes, data may be shared with Euleo group companies.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 5.1. on the basis of the necessity to perform a contract: until the completion of the contract,
  - 5.2. on the basis of a legitimate interest: until the lodging of an effective objection, within the statute of limitations for claims, or until the expiry of another legitimate interest,
  - 5.3. on the basis of legal obligations: for the period set out in these regulations,
  - 5.4. pursuant to the act on legal advisers and the act on advocates, if the personal data were collected in the course of proceedings, for 10 years from the end of the year in which the proceedings ended.
6. **Legitimate interest.** The legitimate interests pursued by the Controller shall include the possibility to defend and assert claims, fraud prevention and ensuring network and system security, administrative purposes of Euleo group companies.
7. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to ensure the performance of the rights granted in general, because it may depend on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
8. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.

9. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
10. **Provision of data.** The provision of data is a prerequisite for the conclusion and performance of a contract; the scope of the necessary data also results from the legal regulations in the event that we represent you in legal proceedings.
11. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (RODO) of 27 April 2016 – for the opposing party and other persons involved in the case (regulated professionals, witnesses, etc), in connection with the provision of legal assistance to Clients.**

1. **Controller.** The Controller of your personal data is Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa, ul. Bociana 22, 31- 231 Kraków. Regarding the protection of your personal data, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing to the address of the seat of Kancelaria.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(f) GDPR, ie legitimate interest, in order to provide legal assistance, at the request of the Client, to prevent fraud and ensure the security of networks and systems, for administrative purposes of Euleo companies,
  - 2.2. Article 6(1)(c) GDPR, in order to comply with obligations arising from professional and corporate regulations and the code of ethics of the profession.
  - 2.3. For the above purposes, on the grounds stated above, the Controller may also process personal data of persons employed by the opposing party and other persons involved in the case that is the subject of legal aid, such as regulated professionals or witnesses.
3. **Categories of data.** The Controller collects the following categories of personal data: identification, contact, financial and asset situation, other related to the specific subject of the order.
4. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share the data with recipients having the status of a separate Controller, in relation to the specificity of the service provided, these may include other legal advisers, attorneys, notaries, auditors, patent attorneys and other representatives of regulated professions or professions of public trust, whose purposes and means of processing are defined by common law. In accordance with recital 48 of the GDPR, for internal administrative purposes, data may be shared with Euleo group companies.
5. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
6. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 6.1. on the basis of a legitimate interest: until the lodging of an effective objection, within the statute of limitations for claims, or until the expiry of another legitimate interest,
  - 6.2. on the basis of legal obligations – for the period stated in these regulations,
  - 6.3. in accordance with the act on legal advisers and the act on advocates, if personal data were collected in the course of proceedings, for 10 years from the end of the year in which the proceedings ended.
7. **Legitimate interest.** The legitimate interest pursued by the Controller is the possibility of providing legal assistance to the Clients, as well as the defence and assertion of claims, fraud prevention and ensuring network and system security, administrative purposes of Euleo group companies.
8. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you; however, not in every case the Controller will be able to exercise the rights granted in general, because their exercise depends on the occurrence of specific conditions, as provided for in Articles 15–20 of the GDPR, and in the case of the Controller who is a legal advisor/attorney, additional restrictions arise from the need to maintain professional secrecy and specific professional regulations – the right to access and restriction of processing is granted only to the extent that it does not violate professional secrecy.
9. **Right to object.** As a general rule, you have the right to object to processing for a purpose based on the legitimate interests of the Controller. If this is the case, the Controller will cease processing your data for that purpose unless the Controller can demonstrate the existence of valid legitimate grounds for

the processing overriding your interests, rights and freedoms. However, in the case of personal data obtained by a legal adviser/attorney in connection with the provision of legal assistance, this entitlement is excluded.

10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Source of data.** The Controller may collect and use your personal data (contact, identification, financial and asset situation) also in a manner other than when received from you, in particular from your opponent, whom we represent, as well as from publicly available registers, such as KRS and CEIDG.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

## Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for the Employee.

1. **Controller.** The Controller of your personal data is Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa, ul. Bociana 22, 31- 231 Kraków. Regarding the protection of your personal data, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing to the address of the seat of Kancelaria.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(b) GDPR, for the conclusion and performance of the contract, which also includes the use of the employee's personal data for business contacts with contractors,
  - 2.2. Article 6(1)(f) GDPR, ie legitimate interest, for the purposes of any possible claim or defence, organisation of working time and performance appraisal, fraud prevention and ensuring network and system security, for administrative purposes of Euleo group companies,
  - 2.3. Article 6(1)(c) GDPR, in order to fulfil tax, balance sheet, labour law and social security obligations, for initial and periodic examinations, to ensure proper OSH conditions,
  - 2.4. Article 6(1)(a) GDPR (consent) in order, for example, to use your image for external purposes (for example on a website).
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share data with recipients having the status of a separate Controller, such as solicitors, barristers, notaries, auditors, patent attorneys, medical professionals and other regulated professions or professions of public trust whose purposes and means of processing are defined by common law.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 5.1. on the basis of the necessity to perform a contract: until the completion of the contract,
  - 5.2. on the basis of legitimate interests: in the case of data not included in employee records, until the expiry of the statute of limitations on claims, ie in the case of employment relationships 3 years from the due date, in the case of non-employee relationships 10 years, or the expiry of other legitimate interests, eg the email account will be archived for a period of one year after the termination of the employment relationship, for the sole purpose of sending an automatic reply informing senders that the employee's email account is not active, or until effective objection is made,
  - 5.3. on the basis of obligations resulting from the regulations – for the time stated in these regulations, the employee's personal files are kept for 10 years from the end of the calendar year in which the employment relationship was terminated or expired, in the case of employees hired before 1 January 1999 and after 1 January 1999 and before 1 January 2019 and in relation to whom the employer has not submitted a statement on the intention to provide an information report for these persons – for a period of 50 years.
6. **Legitimate interest.** The legitimate interests pursued by the Controller are the possibility of defending and asserting claims, organising working time and performance evaluation, preventing fraud and ensuring network and system security.
7. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to ensure the performance of the rights granted in general, because it may depend on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
8. **Right to object.** You have the right to object to processing for a purpose based on the legitimate interests of the Controller. In this case, the Controller will cease processing your data for that purpose

unless the Controller can demonstrate that there are valid legitimate grounds for the processing that override your interests, rights and freedoms.

9. **Consent and information about the possibility of withdrawing consent.** You have the right to withdraw your consent to the processing of your personal data at any time, but withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.
10. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to lodge a complaint to the supervisory authority: the President of the Office for Personal Data Protection.
11. **Provision of data.** The provision of data for purposes based on your consent is voluntary, otherwise it is a condition for the conclusion and implementation of the contract.
12. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.

**Information on the processing of personal data under the terms of the General Regulation of the European Parliament and of the Council of the EU 2016/679 (GDPR) of 27 April 2016 – for the Job Candidate.**

1. **Controller.** The Controller of your personal data is Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa, ul. Bociana 22, 31- 231 Kraków. Regarding the protection of your personal data, you can contact us at [rodo@euleo.pl](mailto:rodo@euleo.pl) or in writing to the address of the seat of Kancelaria.
2. **Purposes and legal basis.** The Controller processes your personal data on the basis of:
  - 2.1. Article 6(1)(b) GDPR, for the purpose of recruitment,
  - 2.2. Article 6(1)(a) GDPR, in the event that you consent to the use of your data for future recruitment, or in the event that you include information in your CV that goes beyond the catalogue stated in Article 22(1) paragraph 1 of the Labour Code
3. **Recipients.** The Controller may outsource your data to recipients acting as processors, such as IT service providers, or share data with recipients having the status of a separate Controller, such as legal advisers, attorneys, notaries, auditors, patent attorneys and other representatives of regulated professions or professions of public trust, whose purposes and means of processing are defined by common law.
4. **Transfer to a third country.** In the event that your personal data is transferred outside the European Economic Area, this will only take place on the basis of a legal prerequisite such as, eg, a contract concluded with the recipient based on the European Commission's standard contractual clauses.
5. **Storage period.** The Controller will process your personal data in accordance with the principle of storage limitation, only for the time necessary to achieve the purpose with a legitimate basis. In the case of processing:
  - 5.1. on the basis of necessity for the performance of pre-contractual activities (recruitment): after completion of the recruitment,
  - 5.2. on the basis of consent to use the data in future recruitments: until the withdrawal of consent or the expiry of a period of 12 months from the submission of the CV.
6. **Rights of the data subject.** You have the right to request from the Controller access to, rectification, erasure or restriction of processing of personal data concerning you, as well as their transfer; however, not in every case the Controller will be able to exercise the rights granted in general, because their exercise depends on the existence of specific conditions, as provided for in Articles 15–20 GDPR.
7. **Consent and information on how to withdraw consent.** You have the right to withdraw your consent to the processing of personal data at any time, but withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.
8. **Complaint.** If you believe that the Controller processing your personal data is in violation of the law, you have the right to complain to the supervisory authority: the President of the Office for Personal Data Protection.
9. **Provision of data.** The provision of data for purposes based on your consent is voluntary, otherwise it is a condition for participation in the recruitment.
10. **Automated decision-making.** The Controller does not make decisions by automated means for the above purposes.