

Privacy Policy

This policy describes the processing of personal data by GTV Poland joint stock company (formerly: GTV Poland spółka z ograniczoną odpowiedzialnością spółka komandytowa) with its registered office in Pruszków (hereinafter referred to as "GTV" or "we" or "us"). The purpose of this Policy is to provide our former, current and potential customers and other interested persons (collectively referred to as "you") with general information about:

- GTV and contact details for matters related to the processing of personal data,
- the principles we follow when processing personal data,
- the types of personal data we collect,
- the reasons for collecting personal data, the purposes of processing personal data, and the legal basis for the processing,
- the recipients of the data, i.e. the entities that process personal data,
- the circumstances in which we collect and process the Customer's personal data,
- the period for which the personal data will be processed,
- the rights of the data subjects.

WHO IS RESPONSIBLE FOR PROCESSING PERSONAL DATA

The entity responsible for processing of personal data is GTV Poland spółka akcyjna (formerly: GTV Poland Limited liability company - Limited partnership with its registered office in Pruszków, entered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under number KRS 0000938133, NIP number 5342505912. GTV's contact details are as follows:

- Postal address: GTV Poland spółka akcyjna with its registered office in Pruszków, ul. Przejazdowa 21, 05-800 Pruszków.
- Telephone number: + 48 22 444 75 00.
- E-mail address: info@gtv.com.pl.

Please be informed that GTV has appointed a data protection officer. Interested persons can contact the Data Protection Officer as follows:

- Postal address: GTV Poland spółka akcyjna with its registered office in Pruszków, ul. Przejazdowa 21, 05-800 Pruszków.
- E-mail address: dpo@gtv.com.pl.

OUR PRINCIPLES

Processing your personal data is an important part of providing you with our products and services. We are grateful for your trust shown by providing us with your personal information. We consider your privacy to be an important part of the services we offer. In order to safeguard your personal data, while increasing the value of our services and offering more opportunities, we adhere to the following general principles.

While processing personal data, we comply with 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 (GIODO).

Freedom of choice

Customer's personal data is their property. We apply due diligence not to make assumptions about Customer's privacy preferences in advance and aim to design our services so that the Customer can opt out of sharing their personal information with us, or to decide whether they want to give us appropriate consent.

Balance of interests

Where the Customer's personal data is processed for a legitimate interest and the need to protect privacy does not override that interest, we may choose to process certain personal data without obtaining the Customer's consent. Please refer to the section "Legal basis and purpose of processing" for more information.

Proportionality

GTV endeavours to process only such Customer personal data as are sufficient, adequate, and relevant to the purpose for which they were collected.

Transparency and openness

GTV adheres to the principle of transparency with regard to what personal data is processed and for what purpose. GTV provides information on the processing of the Customer's personal data upon request.

Compliance with the law

GTV complies with applicable laws, rules and regulations relating to privacy and data protection. We adapt the rules for processing Customers' personal data described in this policy to ensure compliance with the law.

Data quality

Where we process your personal data, we endeavour to ensure that it is correct and up to date. We also endeavour to delete or correct incorrect or incomplete personal data.

Safety

GTV uses appropriate technical and organisational measures to ensure the protection of Customers' personal data against accidental or unlawful destruction, accidental loss or modification, unauthorised disclosure or access, and other forms of unlawful processing. We endeavour to ensure that the level of security and measures in place to protect your personal data are appropriate to the risk factors associated with the nature and use of the personal data.

USEFUL DEFINITIONS

GTV uses the definitions listed below in this Policy:

"controller" means the natural or legal person, public authority, entity or other body which alone or jointly with others determines the purposes and means of the processing of personal data; GTV is the controller within the meaning of this Policy.

"processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;

"personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person means one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name,

an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“special category personal data” means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

WHAT DATA DO WE COLLECT?

Data collection

GTV processes Customers’ personal data. Customer data is collected by GTV through:

- Newsletter subscription;
- user registration form in the Customer Zone - 3D Solids Top Solid Wood and
- user registration form in the Customer Zone - Basis Solids;
- user registration form on the GTV B2B platform;
- user registration form on the GTV API platform;

Customers’ personal data processed by GTV include:

- identification data (company name, name and surname, tax identification number of the Customer if the registered office of the Customer is in the EEA or other registration number, login, IP address of the Customer's end user);
- address data (registered office address, delivery address data);
- contact details (e-mail address, telephone number, contact person);
- data reflecting your use of the website www.gtv.com.pl and related websites, including data collected in the form of cookies and data collected using other tracking technologies.

GTV processes personal data of Suppliers who are natural persons conducting business activities. Supplier data is collected by GTV through the "Become a Supplier" form.

Suppliers’ personal data processed by GTV include:

- contact details (telephone number, contact person, e-mail address);
- data related to the conducted business activity;
- data reflecting your use of www.gtv.com.pl, including data collected in the form of cookies and data collected using other tracking technologies.

GTV processes the personal data of job applicants. Job applicants’ data is collected by GTV via the "Submit CV" form in the "Careers" tab.

Job applicants’ personal data processed by GTV include:

- identification data (name, surname); contact data (e-mail address, telephone number);

- data included in the application documents (educational data, data on previous employment history, data on financial expectations);
- data reflecting your use of www.gtv.com.pl,, including data collected in the form of cookies and data collected using other tracking technologies.

GTV does not collect or process special categories of personal data.

As required by applicable law, we take special care and use appropriate technical and organisational measures to ensure a level of security appropriate to the risk of infringement of natural persons' rights or freedoms.

LEGAL BASIS AND PURPOSE OF PROCESSING

Data processing purposes

GTV processes personal data for the following purposes:

- related to maintenance of a user (Customer) account registered on the gtv.com.pl website or other GTV services, systems and platforms which can be accessed via the gtv.com.pl website, and provision of materials available after logging on to a given service;
- related to taking action on requests made by data subjects before cooperation is established;
- related to the organisation and conduct of the recruitment process;
- related to the subscription to the newsletter and the sending of commercial information, including information on promotions and news;
- direct marketing of products and services offered by GTV;
- archival and evidential purposes in order to pursue GTV's legitimate interests in securing information in the event of a legal need to prove facts, to exercise the rights of data subjects, and to possibly establish, assert or defend against claims.

Legal bases for processing

GTV has the following grounds to justify the processing of personal data:

Performance of the contract

The performance of the agreement is the basis for GTV's processing of personal data for purposes related to the operation of a user's (Customer's) account registered on the gtv.com.pl website or other GTV services, systems and platforms which can be accessed via the gtv.com.pl website, as well as the provision of materials available after logging on to a given service. The provision of data is voluntary, but necessary for the registration of the user on a given website, system or GTV platform.

Taking action at the request of the data subject

The legal basis for the processing of the Supplier's personal data is undertaking by GTV (at the Supplier's request) of actions aiming to contact the Supplier in order to establish cooperation. In this respect, the provision of personal data is necessary in order to undertake the aforementioned activities.

Consent

Consent is the basis for GTV's processing of personal data for the following purposes:

- related to the organization and conduct of the recruitment process;
- related to the subscription to the newsletter and the sending of commercial information, including information on promotions and news;

Please be advised that the withdrawal of any consent granted for processing shall not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Legitimate interest

We have a legitimate interest to process your personal data for the following purposes:

- archiving and evidential purposes, to allow us to pursue our legitimate interests in safeguarding information in the event of a legal need to establish facts,
- to exercise the rights of data subjects, and possibly to establish, assert or defend against claims.

PERSONAL DATA RECIPIENTS:

GTV may share personal data in particular with the following entities:

- to suppliers providing services to GTV, i.e.: providers of job advertisement services and IT systems for recruitment management, companies cooperating in the provision of IT services, hosting services and marketing services; entities within the GTV capital group;
- professional advisers (lawyers, solicitors, accountants, etc. to the extent that they are not separate controllers of personal data);
- as required by law, e.g. in connection with investigations by authorised authorities, litigation or other proceedings.

Processing data on our behalf

Access to your personal data is limited to employees and suppliers who need to use that data to process it on our behalf and who are contractually obliged to keep that data confidential and secure. We endeavour to select data processing services that best protect the integrity of personal data when dealing with third parties.

MARKETING

We will provide you with information about new products or services if you have given your appropriate consent. If you wish to unsubscribe from a particular email newsletter or similar messages, you should follow the instructions in the relevant message.

Websites and cookies

The GTV brand websites contain information about our use of cookies. You can find more information about our use of cookies on our *Cookies Policy* page.

We encourage you to read the relevant information.

DATA PROCESSING PERIOD

Your personal data is only kept for the time necessary to fulfil the purposes listed in this policy or those of which you are otherwise informed. Your personal data is processed:

- in the case of data processing for the purpose of performance of a contract – until the performance of the contract, and after its execution – until the expiration of the limitation period for claims arising from the concluded contract;

- in the case of processing in order to meet the data subject's requests, for the period necessary to take action on the request;
- in the case of data processing on the basis of consent – until its withdrawal, whereby withdrawal of consent does not affect the legality of processing carried out pursuant to consent before its withdrawal;
- in the case of processing for our legitimate interests, including direct marketing, until you object, but for a maximum of 10 years. The period may be extended by the period required to comply with our legal obligations and defend ourselves in litigation.

YOUR RIGHTS

We are committed to respecting the confidentiality of your personal data and to ensuring that you can exercise your rights. Regardless of the purpose or legal basis on which we process your personal data, you have the following rights:

- to request to access the data which we have already acquired
- to request us to rectify or supplement data that we already hold,
- to request us to erase your data to the extent that it is no longer needed for the purposes for which it was collected (as notified in this Policy) or if we no longer have a legal basis for processing it,
- to request us to restrict the processing of your data.

Where processing is based on consent, the data subject shall also have the right to withdraw the consent given at any time.

Where the legal basis for processing is consent or performance of a contract, the data subject also has the right to request the portability of their personal data. This means that you have the right to receive the personal data you provided to us in a structured, machine-readable format for general use so that it can be transmitted directly to another entity, if technically possible.

Furthermore, if the processing is based on our legitimate interests, you also have the right to object to the processing. Upon receipt of an objection, we will stop processing your data for these purposes unless there are compelling legitimate grounds that override your interests, rights and freedoms, or the data are necessary for us to possibly establish, assert or defend claims.

You also have the right to lodge a complaint to the supervisory authority, i.e., the President of the Office for Personal Data Protection.

Your application will be processed without undue delay and with due diligence, within one month of receipt. This period may be extended by a further two months if necessary. We will inform you about extension of this term and reasons for the delay. If applicable law provides for the possibility of charging a fee for processing your request, GTV may charge such a fee.

CHANGES

GTV reserves the right to modify this policy occasionally. The date of the last modification can be found at the end of this document. If we make changes to this policy and the method of using your personal information, we will provide an updated version of this Policy.