

PRIVACY POLICY

Polish Supply Management Leaders (dalej „PSML” or "Administrator") pays particular attention to protecting the confidentiality and privacy of entrusted information. One of our key priorities is to ensure appropriate protection and proper use of personal data collected via websites.

PSML processes personal data for various purposes, and depending on the purpose, different methods of collection, legal bases for processing, use, disclosure and storage periods may apply. Detailed information can be found in the sections that are dedicated to certain data processing operations. This Privacy Policy (referred to as the "**Privacy Policy**") informs how we collect, use and protect the personal data provided to us and what rights are available to persons whose data we process.

Introduction

1. The administrator of personal data is the Polish Supply Management Leaders with its registered office at Plac Trzech Krzyży 10/14, 00-499 Warsaw, correspondence address: Plac Trzech Krzyży 10/14, 00-499 Warsaw, registered in the register of associations, other social and professional organizations of the National Court Register under KRS number: 0000140880, REGON: 015337831, NIP: 5213226558, e-mail address: biuro@psml.pl, (hereinafter referred to as the "Administrator" or "PSML").
2. The Administrator respects the privacy of all people who visit our Website (including all its subpages; hereinafter referred to as the "**Site**").
3. The Administrator undertakes to respect the confidential nature of the data collected when users use the Website.

Principles of data processing

1. The processing of users' personal data is an important part of the process of providing PSML products and services to users.
2. Personal data of the Website users will be processed in accordance with the requirements of generally applicable law, including the Act of May 10, 2018 on the protection of personal data (consolidated text: Journal of Laws of 2019, item 1781) and with the requirements specified in 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 (OJ L. 2016, No. 119, p. 1; further "GDPR").
3. Users' personal data are their property. PSML strives not to assume user's privacy preferences and aims to design its services in such a way that the user can decide whether to provide PSML with appropriate consent and can opt out of sharing his or her personal data with PSML.
4. If the user's personal data are processed for the purpose of pursuing a legitimate interest and the need to protect privacy does not outweigh this interest, PSML may decide to process certain personal data without obtaining the user's consent.
5. PSML processes only such personal data of users that are sufficient, adequate and appropriate in relation to the purpose for which they were collected.
6. PSML adheres to the principle of transparency with regard to what personal data it processes and for what purpose. At the user's request, PSML provides information on the processing of his or her personal data.
7. PSML complies with applicable laws, regulations and regulations regarding privacy and data

protection. We adapt the rules for processing users' personal data described in this policy to ensure compliance with the law.

8. In cases where the user's personal data is processed, he or she ensures that they are correct and up-to-date. We also endeavor to delete or correct incorrect or incomplete personal data.
9. SML applies appropriate technical and organizational measures to ensure the protection of user's personal data against accidental or illegal destruction, accidental loss or modification, unauthorized disclosure or access and other forms of illegal processing. PSML strives to ensure that the level of security and measures applied to protect your personal data are appropriate to the risk factors related to the nature and use of such personal data.

Purposes and operations of data processing

1. The administrator collects data of persons who, among others:
 - registered on the Website via a dedicated registration form, contact form, application form,
 - ordered the newsletter service,
 - ordered products or services offered by PSML.
2. Personal data of the Website users will be processed for the purposes of:
 - implementation of services provided by PSML via the Website and for the purposes indicated in the appropriate and dedicated forms of the Website, including:
 - signing up to receive information, including commercial information (e.g. newsletter, blog notifications, industry reports, etc.) and personalizing the information provided, including data analysis and profiling for marketing purposes;
 - to submit a contact inquiry;
 - to submit an inquiry for an offer;
 - using applications or online tools (e.g. project submission);
 - about the distribution of publications/materials;
 - to sign up for events (e.g. meetings, conferences, competitions) organized by the Administrator;
 - to sign up for training organized by PSML;
 - to sign up for programs organized by PSML
 - about participation in recruitment processes conducted by the Administrator, including in particular submitting recruitment documents, e.g. CV (curriculum vitae) and cover letter, etc.
 - monitor and enforce compliance with the terms of use of the Site;
 - administer and manage the Site;
 - aggregating data for the purposes of analyzing and improving the operation of the Website, and
 - communication with the user, including conducting marketing activities, as well as for other purposes consistent with applicable law, if it is required for the performance of the contract, as well as for the purposes of direct marketing of the Administrator's own services.

3. Depending on the form of using the Website, the user may be asked to provide a smaller or larger scope of information, including personal data, necessary to fulfill his/her wishes/requests.
4. If you wish to use the services provided via the Website, the user may be asked to provide contact details, in particular name and surname, position, company name, address details, e-mail address and telephone number.
5. In the event of expressing separate consents required under the Act of July 18, 2002 on the provision of electronic services and the Act of July 16, 2004 - Telecommunications Law, to the e-mail address or number provided by the user. phone, the Administrator may send marketing information periodically. As part of the marketing information and newsletter sent, we aim to best match the marketing messages to the user's business and professional preferences.
6. Personal data of Website users will be stored only for the period necessary to achieve the purposes of processing, but no longer than until the expiry of the limitation period for any claims that may arise from the relationship with the Website user. In the case of processing the user's personal data for direct marketing purposes, personal data will be processed for as long as necessary to fulfill the user's wish/request, unless the user has previously objected to the processing of his or her personal data for this purpose.
7. Providing personal data is voluntary, but necessary to provide services such as sending marketing information in the form of a newsletter, enabling participation in an event or training, providing materials/publications.
8. The Administrator has concluded an agreement with the hosting company home.pl S.A. regarding entrusting the processing of personal data necessary to provide services, in the scope of data entered by users of the Website in appropriate contact forms (e.g. name, surname, address details, e-mail address). The administrator may share the above-mentioned data. service providers after receiving them from users.
9. The hosting company will process personal data of Website users on behalf of and on behalf of and to the extent indicated by the Administrator. The hosting company will process the above personal data of Website users for the duration of the hosting agreement. The hosting company is obliged to comply with all the rules contained in this Privacy Policy.
10. As part of the Administrator's activities, no automated decisions are made within the meaning of Art. 22 GDPR. The Administrator uses the analysis of business and professional preferences to optimally match both marketing communication and services offered by the Administrator to the user.
11. The Administrator does not transfer data outside the European Economic Area. The administrator may decide to transfer data outside the European Economic Area - only to the extent permitted by law. Current information on whether and how the Administrator transfers data outside the European Economic Area will be included in this Policy.

Legal grounds for processing personal data

1. PSML has the following legal bases justifying the processing of users' personal data:
 - 6 section 1 letter a) GDPR - consent is the basis for the processing of personal data by PSML, including: for the following purposes:
 - related to the organization and conduct of the recruitment process;
 - related to enabling the user to participate in an event (e.g. meeting, conference, competition) organized by the Administrator;(consents to processing may be withdrawn at any time, but this does not affect the lawfulness of data processing before its withdrawal)

- 6 section 1 letter b) GDPR - performance of the contract is the basis for PSML's processing of personal data for purposes related to enabling the user to participate in training organized by PSML. Providing data is voluntary, but necessary for the conclusion and performance of the contract by PSML;
- • 6 section 1 letter b) GDPR - the legal basis for the processing of users' personal data is that PSML (at the user's request) takes action to contact the user in order to establish cooperation. In this regard, providing personal data is necessary to undertake the above-mentioned activities;
- • 6 section 1 letter f) GDPR - PSML has a legitimate interest in processing personal data, among others: for the following purposes:
 - about direct marketing of products and services offered by PSML;
 - about sending commercial information;
 - o monitor and enforce compliance with the terms of use of the Website;
 - o administer and manage the Website;
 - o aggregating data for the purposes of analyzing and improving the operation of the Website;
 - about communication with the user;
 - o archival and evidentiary purposes, enabling the implementation of our legitimate interests in securing information in the event of a legal need to prove facts, exercising the rights of persons whose data is processed, as well as the possible determination, investigation or defense against claims.

Transfer of personal data

1. The Administrator does not collect personal data for the purpose of transferring or selling them to external entities, unrelated to the PSML group companies, for marketing purposes.
2. For other, strictly necessary purposes, the personal data stored by us may be transferred:
 - external organizations providing applications/functionalities or providing data processing or IT services (e.g. providers of information technology, cloud software, as well as entities providing identity management, hosting and website management services, data analysis, creation backups, security, etc.);
 - external organizations that assist us in providing products or services or information;
 - law enforcement authorities, regulatory bodies and other government authorities or third parties, if the requirement to transfer data results from applicable legal provisions.

Users' rights

1. The person whose personal data is processed by the Administrator is entitled to submit a request to exercise his or her rights in writing or electronically using the contact form available on the Administrator's website. This does not exclude the right of such a person to submit a request in another form that is acceptable and possible to document by the Administrator. The data subject's request should always indicate what personal data and activities related to the implementation of the request apply. If the submitted request is not specified precisely, e.g. by failure to indicate the scope of data or activities related to the implementation of the request, the Administrator asks the entity to specify the request. If the request remains unspecified, the Administrator has the right to suspend the implementation of the request until sufficient information is obtained from the data subject.
2. The submitted request will be implemented in accordance with this Privacy Policy, within a reasonable time taking into account the costs, the degree of difficulty of fulfilling the request and the principles indicated in this Privacy Policy.

3. Communication with the data subject regarding the exercise of his or her rights takes place in a concise, transparent, understandable and easily accessible form and in a clear and simple language.
4. A response to the submitted request will be provided without undue delay, no later than one month from receipt of the request, containing information on the actions taken in connection with it. If it is necessary to extend this deadline, no later than within one month of receiving the request, the Administrator provides the data subject with information about the extension of the deadline for considering the request and provides the reasons for the delay, e.g. due to the complexity of the requests or the number of requests. The deadline may not be extended by more than two months. If the data subject's request is not accepted, no later than within one month of receiving the request, the Administrator will provide information about the refusal to take action in connection with the submitted request, the reasons for not taking action, the possibility of filing a complaint with the supervisory authority and the use of legal remedies before the court.
5. The administrator communicates with persons whose data he processes in Polish. If a language other than Polish is used standardly in communication with a given entity, the Administrator will provide a response in a given language.
6. The right to request access to your own personal data
 - The data subject is entitled to obtain from the Administrator confirmation whether the Administrator processes his or her personal data, and if this is the case, the entity is entitled to obtain access to the data and the following information about:
 - about the purpose of processing;
 - about the category of personal data processed;
 - recipients or categories of recipients to whom personal data have been or may be disclosed, in particular recipients in third countries or international organizations;
 - the planned period of personal data processing, if possible, and when it is not possible, about the criteria for determining this period, assuming that this period is limited to the necessary minimum;
 - the right to request the Administrator to rectify, delete or limit the processing of the data subject's personal data and to object to such processing;
 - the right to lodge a complaint with the supervisory authority regarding personal data if the entity believes that the processing violates its rights;
 - if the personal data were not collected from the data subject - all information about their source;
 - information about automated decision-making, including profiling, important information about the principles of making decisions and about the importance and expected consequences of such processing for the data subject.

7. The right to request access to your own personal data

- The data subject has the right to request the Administrator to immediately correct any inaccurate personal data concerning him or her.

The data subject has the right to request that incomplete personal data be completed, including by providing an additional statement.

8. The right to erasure of data (the right to “be forgotten”)

- If the data subject wants to exercise the Administrator's right to request the deletion of his or her data, such a request should be expressed in the form of a clear statement indicating the scope of the request.
- The Administrator may not accept a request to delete data resulting from the withdrawal of consent by the data subject, if the consent of the subject was not the only condition for the processing of his data, in particular when the purpose of data processing is still the implementation of the contract binding the data subject and the Administrator, or when the processing of these data data is necessary to fulfill the legal obligation imposed on the Administrator.
- The processing of personal data by the Administrator, despite the request to delete them, is lawful if it is necessary, in particular, for the Administrator to fulfill a legal obligation, for the Administrator to perform tasks carried out in the public interest, for statistical purposes or to establish, investigate or defense of claims.

9. The right to restrict the processing of personal data:

- the data subject has the right to request restriction of the processing of his or her data by the Administrator, e.g. when:
 - the entity questions the accuracy of its personal data (for a period enabling the Administrator to check the accuracy of its data);
 - the processing of the data is unlawful and the data subject opposes their deletion and requests instead the restriction of processing;
 - the controller no longer needs the personal data for the purposes of processing, but they are needed by the data subject to establish, pursue or defend claims;
 - the data subject has objected to the processing pursuant to Art. 21 section 1 GDPR, until it is determined whether the legally justified grounds on the part of the Administrator override the grounds for the data subject's objection.
- A request to limit data processing should be submitted in the form of an explicit declaration of the data subject indicating the scope of the request.
- Limiting processing by the Administrator may be implemented, in particular, by marking stored personal data in the system in order to limit their future processing.
- The administrator may additionally, in order to limit the processing of personal data, in particular:
 - temporarily transfer selected personal data to another processing system;
 - prevent the user of the IT system used by the Administrator from accessing selected data;
 - limit processing in automated data files by technical means in such a way that personal data are not subject to further processing or can be changed.
- Personal data whose processing has been restricted, the Administrator may process, with the exception of storage, only:
 - with the consent of the data subject;
 - to establish, pursue or defend legal claims, or to protect the rights of another natural or legal person;
 - for reasons of important public interest of the Union or of a Member State.

10. Right to data portability:

- The data subject, at his/her request, receives in a structured, commonly used machine-readable format, e.g. .doc, .docx, .pdf, etc., personal data concerning him/her and provided to the Administrator by the data subject, processed by the Administrator, and has the right to request that these data be sent to another administrator. He also has the right to send this data to another administrator without any obstacles from the Administrator.
- The data subject has the right to request the transfer of data only in relation to data that he or she has provided to the Administrator, if these data are processed by the Administrator on the basis of the data subject's consent or on the basis of a contract to which the data subject is a party.
- The data subject to transfer is:
 - for data processed by the Administrator in an automated manner. Data contained in paper files are not subject to transfer.
 - for data that was consciously and actively provided to the Administrator by the data subject.
 - The administrator will provide the opportunity to receive the file containing the data to be transferred to the data subject's private device. If the data subject does not use electronic devices, the Administrator may enable the submission of an application in another form, e.g. on paper.

11. The right to object to the processing of personal data:

- If the data subject raises an objection, he or she should indicate the specific purpose of processing he or she objects to and demonstrate what his or her particular situation is.
- • The Administrator takes into account the objection or refuses to take it into account, after analyzing whether the particular situation of the data subject overrides the legally justified grounds for processing by the Administrator. For the duration of the analysis, the Administrator, at the express request of the data subject, applies processing restrictions pursuant to Art. 18 section 1 GDPR.
- • When refusing to accept the objection, the Administrator will explain in an accessible way to the data subject the reasons why he believes that the interests, rights and freedoms of this person are not of a superior nature.
- • The administrator may process data for direct marketing purposes (including profiling) based on his legitimate interest. If the data subject objects to this type of processing, the Administrator no longer processes the data for this purpose.
- • The administrator takes into account the data subject's objection to processing, submitted in accordance with Art. 21 section 1 GDPR, unless there are legitimate grounds for processing that override the right to object and the interests of the person submitting the objection.

12. The right to file a complaint with the supervisory authority (President of the Office for Personal Data Protection):

- If the data subject believes that the processing of his or her personal data violates his or her rights, he or she may submit a complaint to the supervisory authority for the protection of personal data, which is the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw.

Use of cookies

1. Subject to obtaining the consent of the Website user, the Administrator may store some information on the user's computer using cookies.
2. Cookies are used, among other things, to: assist in logging in the user (e.g. remembering the user's name if the user registers or logs in); remembering certain user preferences; Support the Administrator in improving the Website.
3. The Website uses two basic types of cookies:
 - "session" cookies. "Session" cookies are temporary files that are stored on the user's end device until logging out, leaving the website or turning off the software (web browser);
 - "persistent cookies". "Permanent" cookies are stored on the user's end device for the time specified in the cookie parameters or until they are deleted by the user.
4. In many cases, the software used to browse websites (web browser) allows cookies to be stored on the user's end device by default. Users of the Website may change cookie settings at any time. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the web browser settings or to inform each time they are placed on the Website user's device. Detailed information about the possibilities and methods of handling cookies is available in the software (web browser) settings.
5. The user may express the consent referred to above using the settings of the software installed in the telecommunications terminal device used by him or the service configuration - i.e.: to disable or limit the use of cookies, the user may change the settings of his web browser. However, the consequence of such action may be incorrect operation or loss of access to some subpages of the Website.
6. The following types of cookies are used on the Website:
 - "necessary" cookies enabling the use of services available on the Website, e.g. authentication cookies used for services requiring authentication on the Website; cookies used to ensure security, e.g. used to detect authentication abuses within the Website;
 - "performance" cookies, enabling the collection of information on how the Website pages are used;
 - "functional" cookies, enabling "remembering" the settings selected by the user and personalizing the user interface, e.g. in terms of the selected language or region from which the user comes, font size, appearance of the website, etc.;
 - "advertising" cookies, enabling the provision of advertising content to users more tailored to their interests.
 - "analytical" cookies collect information about the use of a given website, such as the pages visited by a given user and any error messages; they do not collect information that identifies the user, and the collected data is aggregated in such a way that it becomes anonymous. Analytical cookies are used to improve the performance of the website.
 - We use cookies from the following providers on our website: Facebook, LinkedIn, YouTube, Google Analytics, Google Ads, Twitter, Hubspot, Google Tag Manager.
7. The Administrator informs that restrictions on the use of cookies may affect some functionalities available on the Website.
8. More information about cookies is available at www.wszystkoociasteczkach.pl, www.allaboutcookies.com or in the "Help" section in the web browser menu.

Risks associated with use of the Site

1. The User should be aware that data transmitted in the public telecommunications network between his device and the Website is not completely secure. The Administrator is unable to ensure full protection and security of this data when communicating with the Website. Nevertheless, the Administrator guarantees that he will take appropriate actions to secure data sent to him electronically, in particular personal data provided by the user via electronic forms.
2. The Website may contain links to third-party websites or services. These third-party links may be related to their own electronic service activities and privacy policies, which you agree to comply with when you click on the link and leave the Site.

Changes to the the Privacy Policy

This Privacy Policy may change from time to time. Any changes to the Privacy Policy will be published on the Website.

Contact

If you have any questions regarding the processing of personal data by the Administrator, you can contact the Administrator at the e-mail address biuro@psml.pl.