

### PRIVACY NOTICE CONCERNING THE CONTACT FORM

pursuant to article 13 of 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 (General Data Protection Regulation), Official Journal of the European Union L.2016.119.1 ("GDPR").

## **1. DATA CONTROLLER**

The controller of your data is **"JDP Drapała & Partners" spółka jawna** with its registered office in Warsaw, ul. Bonifraterska 17, 00-203 Warszawa, entered in the business register of the National Court Register kept by the District Court for the Capital City of Warsaw, XII Commercial Division of the National Court Register under number 0000880140, REGON: 140887753, NIP: 7010056483 (**"Controller"** or **"JDP**").

The Controller has a website at <u>www.jdp-law.pl</u>; in addition to contacting us by post or vising our office at the address indicated above, you may contact us at <u>office@jdp-law.pl</u>.

## 2. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

Your personal data is processed for the purposes of:

- 1. EXCHANGING CORRESPONDENCE, including replying to the messages sent to the Controller, for the purposes of the legitimate interests pursued by JDP (article 6 par. 1 item f GDPR) which includes making contact available to persons interested in JDP's activity, and exchanging communications,
- 2. ARCHIVING materials and communications created by JDP as part of its business activity, for the purposes of the legitimate interests pursued by JDP (article 6 par. 1 item f GDPR) which includes documenting the business activity in accordance with applicable regulations, including the principles of practicing as an attorney-at-law, an advocate or a tax advisor.

# 3. DATA RECIPIENTS AND TRANSFERRING PERSONAL DATA OUTSIDE THE EEA

1. Personal data may be provided to entities cooperating with JDP based on concluded agreements. In particular, personal data may be made available to entities

providing IT support to the Controller, including those operating and maintaining IT systems and providing data hosting or cloud services; electronic mail service providers; entities archiving and shredding documents; post operators or couriers; consulting companies cooperating with JDP. Moreover, personal data may be shared with public authorities or public entities (or those performing public tasks) authorised to receive data under applicable legal provisions.

2. Generally, personal data will not be provided outside the European Economic Area. However, if such transfer is to take place in the future – which may happen, for instance, if the Controller potentially uses IT solutions based on cloud solutions or solutions maintained outside the European Economic Area – the Controller will provide a mechanism that will legalise such transfer under the European legislation and will guarantee personal data protection. The data subjects will be informed about the transfer in advance.

## 4. PERIOD FOR WHICH PERSONAL DATA WILL BE STORED

Your personal data will be stored for a period necessary to handle your inquiry and for 12 months after this period for archiving purposes.

## 5. VOLUNTARY PROVISION OF PERSONAL DATA

Provision of personal data is necessary to exchange correspondence with the Controller.

#### 6. PROFILING AND AUTOMATED DECISION-MAKING

Personal data processed for the purposes described above will not be subject to profiling and no automated decision-making will take place with respect to the data subjects.

#### 7. DATA SUBJECTS' RIGHTS

- 1. In connection with JDP's processing of personal data, the data subjects have the following rights:
  - a. pursuant to article 15 GDPR right of data access;
  - b. pursuant to article 16 GDPR right to data rectification;
  - c. pursuant to article 17 GDPR right to data erasure;
  - d. pursuant to article 18 GDPR right to restriction of data processing;
  - e. pursuant to article 21 GDPR right to object the processing where personal data is processed for the purposes of the Controller's legitimate interests.

- 2. These rights may be exercised by making a respective demand to the Controller to the addresses indicated in sec. 1 "Data Controller" above.
- 3. In connection with JDP's processing of personal data, the data subjects also have a right to lodge a complaint with a competent supervisory authority, in particular in the country of the data subjects' habitual residence, place of work or place of alleged violation. In Poland the supervisory authority is the Head of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warszawa.

# PRIVACY NOTICE FOR PERSONS WITH WHOM ELECTRONIC COMMUNICATION IS EXCHANGED

provided in accordance with Article 13 of 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 (General Data Protection Regulation), OJ L 119, 4.5.2016 (hereinafter: "GDPR").

# **1. PERSONAL DATA CONTROLLER**

The personal data controller is **"JDP Drapała & Partners" spółka jawna**, with its registered office in Warsaw, ul. Bonifraterska 17, 00-203 Warszawa, entered in the Register of Businesses of the National Court Register (KRS) maintained by the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register, with KRS number: 0000880140, REGON: 140887753, NIP: 7010056483 (hereinafter "**Data Controller**" or "**JDP**").

The Data Controller has an Internet website at: <u>www.jdp-law.pl</u>, and apart from the postal and personal contact at its registered office, it may be contacted by email at: <u>office@jdp-law.pl</u>.

## 2. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

Personal data are processed for the following purposes:

- EXCHANGE OF COMMUNICATION, including responding to messages sent to the Data Controller, based on the legitimate interest of JDP (Article 6(1)(f) GDPR), namely keeping in contact with persons interested in our activity, timely exchanging of any communication related to performed activity, and taking care of the quality of cooperation with customers, clients and other stakeholders – with the use of electronic mail;
- 2. TALKS BEFORE ENTERING INTO AN AGREEMENT, ENTERING INTO AND PERFORMANCE OF AN AGREEMENT based on the legitimate interest of JDP (Article 6(1)(f) GDPR), namely taking actions related to the performed activity with the participation of persons authorised/appointed to act on behalf of or for other entities being the other party to an agreement or pursuant to Article 6(1)(b) if the above-mentioned actions are taken directly by a natural person that is the other party to an agreement;
- ARCHIVING materials and messages, including communication generated by JDP as part of its business activity, based on the legitimate interest of JDP (Article 6(1)(f) GDPR), namely recording of performed activity in accordance with legal provisions in force, including principles applicable to the professions of attorneyat-law, lawyer and tax advisor.

#### 3. DATA RECIPIENTS AND TRANSFER OF PERSONAL DATA OUTSIDE THE EEA

- Personal data may be transferred to entities cooperating with JDP pursuant to signed agreements. In particular, data may be shared with entities that provide the Data Controller with IT support, including service and maintenance of IT systems, data hosting and cloud services, with email, archiving and document destruction service providers, postal operators or courier companies, and consulting companies with whom JDP cooperates. Furthermore, personal data may be transferred to public authorities or bodies (or those who perform public tasks) authorised to obtain the data in accordance with legal provisions in force.
- 2. In principle, personal data will not be transferred outside the European Economic Area. However, if such transfer of personal data occurs in the future, which may happen, among others, as a result of the Data Controller's possible use of IT solutions based on cloud solutions or maintained by a service centre situated outside the European Economic Area, the Data Controller will ensure a mechanism according to which, in accordance with the EU law, it will make the transfer lawful and ensure relevant guarantees of personal data protection. Data subjects will receive prior notification regarding such transfer.

# 4. DATA RETENTION PERIOD

JDP will process personal data for the period necessary to handle the case in relation to which the communication is exchanged, and afterwards the communication will be retained to the extent necessary for archiving purposes related to the recording of the performed business activity, for a period not shorter than the limitation period for possible claims.

## **5. VOLUNTARY PROVISION OF PERSONAL DATA**

The provision of personal data is necessary in order to exchange communication with the Data Controller.

#### 6. PROFILING AND AUTOMATED DECISION-MAKING

The data processed for the purposes described herein will not be subject to profiling, and data subjects will not be subject to automated decision-making.

#### 7. RIGHTS OF DATA SUBJECTS

- 1. In connection with the processing of personal data by JDP, data subjects have the following rights:
  - a. pursuant to Article 15 GDPR the right to access their personal data;
  - b. pursuant to Article 16 GDPR the right do to rectify their personal data;
  - pursuant to Article 17 GDPR the right to request erasure of their personal data;

- d. pursuant to Article 18 GDPR the right to request restriction of processing of their personal data;
- e. pursuant to Article 21 GDPR the right to object to processing of their data unless the processing is based on the legitimate interest of the Data Controller.
- The above-listed rights may be exercised by expressing the relevant request to the Data Controller and sending it to the contact addresses presented in Clause 1. "Personal Data Controller" shown at the beginning of this notice.
- 3. In connection with the processing of personal data by JDP, data subjects also have the right to lodge a complaint with the relevant supervisory authority, in particular in the state of their habitual residence, their place of work, or the place where the alleged breach has occurred. In Poland, the supervisory authority is President of the Personal Data Protection Office, Stawki 2, 00-193 Warszawa.

### PRIVACY NOTICE FOR NEWSLETTER SUBSCRIBERS

pursuant to article 13 of 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 (General Data Protection Regulation), Official Journal of the European Union L.2016.119.1 ("GDPR").

# **1. DATA CONTROLLER**

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The Controller has a website at <u>www.jdp-law.pl</u>; in addition to contacting us by post or vising our office at the address indicated above, you may contact us at <u>office@jdp-law.pl</u>.

## 2. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

Your personal data are processed for the purposes of INFORMING YOU ABOUT PRACTICING A LEGAL PROFESSION AND JDP'S ACTIVITIES, including but not limited to, sending newsletters, alerts, information about seminars and other events, based on your voluntary consent given by completing the newsletter sign up form and clicking "Submit" (art. 6 par. 1 item a GDPR).

# 3. DATA RECIPIENTS AND TRANSFERRING PERSONAL DATA OUTSIDE OF THE EEA

- Your personal data may be provided to entities cooperating with JDP based on concluded agreements. In particular, your personal data may be made available to entities supporting the Controller in information activities (such as entities organising dispatch of newsletters, letters, invitations and other communications and materials on JDP's behalf), entities providing IT support to the Controller, including those operating and maintaining IT systems and providing data hosting or cloud services; electronic mail service providers; entities archiving and shredding documents; post operators or couriers; consulting companies cooperating with JDP. Moreover, personal data may be shared with public authorities or public entities (or those performing public tasks) authorised to receive data under applicable legal provisions.
- Generally, your personal data will not be provided outside of the European Economic Area. However, if such transfer is to take place in the future – which may happen, for instance, if the Controller potentially uses IT solutions based on cloud solutions or solutions maintained outside of the European Economic Area – the Controller will provide a mechanism that will legalise such transfer under the

European legislation and will guarantee necessary personal data protection. The data subjects will be informed about the transfer in advance.

### 4. PERIOD FOR WHICH PERSONAL DATA WILL BE STORED

Your personal data will be stored until you effectively revoke your consent to the processing of your personal data for specific purposes or you unsubscribe from newsletters and other materials.

## **5. VOLUNTARY PROVISION OF PERSONAL DATA**

The provision of personal data for the purposes of being informed about practicing a legal profession and JDP's activities is voluntary. However, if you do not provide the data, informing you about practicing a legal profession and JDP's activities in the certain form will not be possible.

#### 6. PROFILING AND AUTOMATED DECISION-MAKING

Personal data processed for the purposes described above will not be subject to profiling, and no automated decision-making will take place with respect to the data subjects.

## 7. DATA SUBJECTS' RIGHTS

- 1. In connection with JDP's processing of personal data, the data subjects have the following rights:
  - a. pursuant to article 15 GDPR right of data access;
  - b. pursuant to article 16 GDPR right to data rectification;
  - c. pursuant to article 17 GDPR right to data erasure;
  - d. pursuant to article 18 GDPR right to restriction of data processing;
  - e. right to revoke the consent at any time where the processing is based on the consent; the revocation will not affect the lawfulness of processing based on the consent before it has been revoked.
- 2. These rights may be exercised by making a respective demand to the Controller to the addresses indicated in sec. 1 "Data Controller" above. Moreover, in the case of newsletters it is possible to use a special address for unsubscribing from a given form of correspondence by clicking a relevant link at the bottom of each correspondence. Making the statement of unsubscribing will be deemed as a consent revocation or an objection to receiving the type of correspondence to which the statement refers.
- 3. In connection with JDP's processing of personal data, the data subjects also have a right to lodge a complaint with a competent supervisory authority, in particular

in the country of the data subjects' habitual residence, place of work or place of alleged violation. In Poland the supervisory authority is the Head of the Personal Data Protection Office, Stawki 2, 00-193 Warszawa.