

Rules for the Processing of Personal Data of Contractors and Their Employees at MEFTA Green Transformer Energy Poland Ltd.

The basis for the introduction of the Rules of Processing of Personal Data, is the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016 on the protection of individuals in relation to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (General Data Protection Regulation), hereinafter in the regulation referred to as GDPR.

In particular, based on the articles of the GDPR:

- Article 24(1) of the GDPR - obliges the data controller (here: MEFTA Green Transfo Energy Poland Spółka z o.o.) to implement appropriate organizational and technical measures to ensure compliance of data processing with the provisions of the GDPR. Regulations such as these are precisely one of the elements of meeting this requirement.

- Article 32 of the GDPR - obliges the controller to ensure the security of personal data processing by implementing appropriate technical and organizational measures. Regulations explaining the rules of data processing are part of this process.

- Article 6 of the GDPR - deals with the lawful basis for processing personal data, which must be defined and in accordance with the law, which also justifies the need for regulations explaining data processing rules to contractors.

Thus, the regulations are a tool that serves to ensure that the processing of personal data is in compliance with applicable laws, in particular the GDPR.

1. Personal Data Administrator

The Administrator of personal data is Mefta Green Transfo Energy Poland sp. z o.o. based in Mikołów, Żwirki i Wigury 52, 43-190 Mikołów, VAT: PL635-184-36-61 represented by Alina Dębska.

2. Scope of processed Personal Data

The company processes personal data of contractors and their employees in the following scope:

- Name,
- E-mail address,
- Telephone number,
- Other data, insofar as necessary for the performance of the contract. If additional data is processed, the Company will inform the data subjects of the new scope of processing.

3. Purpose of Personal Data Processing

Personal data shall be processed solely for the purpose of:

- Fulfillment of agreements concluded with contractors,
- Performing legal obligations (e.g. accounting, tax obligations),
- Protecting the Company's interests, including defense against legal claims.

4. Legal Basis for Data Processing

The processing of personal data is carried out on the basis of:

- Performance of a contract of which the contractor or his employee is a party (Article 6(1)(b) of the GDPR),
- Legal obligations on the Administrator (Article 6(1)(c) GDPR),
- Legitimate interests of the Administrator, such as defense against claims or record keeping (Article 6(1)(f) GDPR).

5. Period of Data Retention

Personal Data will be stored:

- For the period of performance of the contract and for the period prescribed by law (e.g., retention of accounting records for 5 years),
- For the time necessary to protect the Company's interests, including defense against possible legal claims.

6. Transfer of Personal Data

Personal Data may be transferred to:

- To entities that process data on behalf of the Company (e.g., IT service providers, accounting firms) on the basis of concluded data processing entrustment agreements,
- To state authorities, if it results from applicable laws.

7. Rights of Data Subjects

Data subjects have the right to:

- Access to their personal data,

- Correction of data that is incorrect or outdated,
- Right to erasure („right to be forgotten”) in cases provided for by the GDPR,
- Restriction of data processing,
- Transfer of data to another controller,
- To raise objections to data processing in justified cases.

8. Technical and Organizational Measures

Mefta Green Transfo Energy Poland sp. z o.o. has implemented appropriate technical and organizational measures to ensure the security of the processed personal data, including:

- Data access control,
- Security of IT systems,
- Regular training of employees in the protection of personal data,
- Password policy and data encryption.

9. Personal Data Protection Inspector

The Inspector of Personal Data Protection at Mefta Green Transformer Energy Poland sp. z o.o. is Mrs. Alina Dębska. In matters concerning the processing of personal data, she can be contacted at e-mail: alina.debska@green-transfo.com or by phone: +48 32 77 28 291.

10. Personal Data Protection Breach Procedure

Mefta Green Transfo Energy Poland sp. z o.o. has implemented a procedure for personal data protection breaches, in accordance with applicable laws, in particular the GDPR. This procedure specifies the actions to be taken by the Company in the event of a breach, including how to identify, report and resolve data protection incidents.

In the event of a data protection breach, the Company:

- Assesses the risk of violating the rights and freedoms of individuals.
- Reports the incident to the supervisory authority (Personal Data Protection Office) within 72 hours of identifying the breach, if the breach may cause a risk of violation of the rights and freedoms of individuals.
- Informs data subjects of the breach if there is a high risk of violation of their rights and freedoms.

11. Reporting of Data Protection Violations.

Individuals, who become aware of a violation of personal data protection in connection with the activities of Mefta Green Transformer Energy Poland sp. z o.o., may report such violation as follows:

- By contacting the Data Protection Inspector - Mrs. Alina Dębska, e-mail address: alina.debska@green-transfo.com or by phone: +48 32 77 28 291.
- The notification should include a description of the breach, the date on which it was discovered and, if possible, an indication of what personal data has been breached.

The Company undertakes to take appropriate action in the event of a reported violation and to inform the notifying person of the outcome of the investigation.

12. Amendments to the Data Processing Policy

The Company reserves the right to amend this policy due to changes in legislation or the introduction of new data processing processes.

13. Attachments

The appendix to this document is the Information on the processing of personal data in connection with the concluded contract, which contains detailed information on the purposes, legal basis, scope and period of processing of personal data of contractors and their employees. This document is an integral part of the Regulations and is a detailed supplement to the principles described above.

INFORMATION ON THE PROCESSING OF PERSONAL DATA
IN CONNECTION WITH THE CONCLUDED AGREEMENT

- 1) The administrator of the personal data covered by the Agreement concluded with you (hereinafter: “Agreement”) is Mefta Green Transfo Energy Poland sp. z o.o., Żwirki i Wigury 52, 43-190 Mikołów (hereinafter: “Administrator”).
- 2) Personal data will be processed for the purpose of concluding and properly performing the Agreement, including contacts related to the Agreement and making settlements.
- 3) The basis for processing by the above personal data is the Agreement concluded between you and the Administrator (Article 6(1)(b) of the GDPR).
- 4) Provision of personal data indicated in the Agreement is voluntary, but remains necessary for the possibility of concluding and proper implementation of the Agreement.
- 5) The Administrator does not intend to share the data indicated in the Agreement with recipients of the data.
- 6) Personal data will be kept for the period necessary for the execution of the Agreement, and after its termination, for the period required by law.
- 7) Please be advised that with respect to your personal data processed by the Administrator, you have the right to:
 - (a) access to such personal data,
 - b) to rectify or supplement such data if they are not correct or complete (Article 16 of GDPR),
 - c) request the erasure or restriction of the processing of such data - with respect to situations where the basis of processing is a contract (cf. point 4 above), this right may be exercised limited to the cases indicated in Article 17(1) GDPR (in relation to erasure) and 18(1) GDPR (in relation to restriction), respectively;
- 8) Personal data will not be processed by the data controller by automated means or subjected to profiling.
- 9) Personal data will not be transferred to third countries.
- 10) You have the right to lodge a complaint with a supervisory authority.