

**Personal Data Processing Notice
pursuant to Article 13 of the GDPR**

I. Data Controller

Suwalska Specjalna Strefa Ekonomiczna S.A., with its registered seat in Suwalki, ul. Noniewiczza 49, 16-400 Suwałki, entered in the Business Register of the National Court Register under KRS number 0000044260, NIP [Tax ID] 8441443481, REGON [Registry] 790254065, share capital 19,967,900, paid up in full (hereinafter: SSSE S.A.).

II. Obtain information about the processing of your personal data

By writing to the Controller:

Suwalska Specjalna Strefa Ekonomiczna S.A., with its registered seat in Suwalki, ul. Noniewiczza 49, 16-400 Suwałki, or to: rodo@ssse.com.pl

III. Data acquisition and purpose of its processing

The data is obtained during a process to which it is related and directly from the data subjects.

No.	Purpose of processing	Legal basis	Legally legitimate purpose, if any
1.	RECRUITMENT PROCESS: (a) the performance of legal obligations related to the employment process, including primarily the Labor Code; b) for the purpose of conducting future recruitment processes, if consent is given to the processing of data for this purpose; (c) for the purpose of establishing or bringing potential claims or defending against such claims by SSSE S.A.	a) the legal basis for the processing is a legal obligation incumbent on SSSE S.A., in accordance with Article 6(1)(c) of the GDPR, in connection with the provisions of the Labor Code, and with regard to data not required by law, the legal basis for processing is consent, in accordance with Article 6(1)(a) of the GDPR (b) the legal basis for processing is consent in accordance with Article 6(1)(a) of the GDPR (c) the legal basis for data processing is the legitimate interest of SSSE S.A., in accordance with Article 6(1)(f) of Regulation No 2016/679, to allow SSSE S.A. to defend its rights.	a) - b) - (c) allowing SSSE S.A. to defend its rights
2.	INVESTOR ACQUISITION PROCESS (Process prior to the entry into force of the Act on promoting new investments): Implementation of the provisions of the Act on special economic zones i.e. dated 11 May	The legal obligation incumbent on SSSE S.A. pursuant to Article 6(1)(c) of the GDPR, in connection with the provisions of Articles 8 and 16-17 and 19 of the Act on special economic zones i.e. dated	-

	<p>2017 (Journal of Laws of 2017, item 1010, as amended) and the Regulations of the Minister of the Economy of 2 July 2009 on entrusting the Suwalska Specjalna Strefa Ekonomiczna S.A. with the power to grant permits to conduct business activities in the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] and to control the fulfillment of permit conditions (Journal of Laws of 15 July 2009, as amended)</p>	<p>11 May 2017 (Journal of Laws of 2017, item 1010, as amended) in relation to §1 of Regulation of the Minister of the Economy of 2 July 2009 on entrusting the Suwalska Specjalna Strefa Ekonomiczna S.A. with the power to grant permits to conduct business activities in the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] and to control the fulfillment of permit conditions (Journal of Laws of 15 July 2009, as amended)</p>	
3.	<p>INVESTOR ACQUISITION PROCESS (Process <u>after</u> the entry into force of the Act on promoting new investments):</p> <p>Implementation of the provisions of the Act of 10 May 2018 on the promotion of new investments (Journal of Laws of 2018, item 1162) in the area assigned to that area administrator in accordance with the regulation issued pursuant to Article 5(3) of the Act in conjunction with §1 of the Regulation of the Minister of Entrepreneurship and Technology of 29 August 2018 on entrusting the administrator of the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] with the power to issue decisions on support and to control the implementation of decisions on support (Journal of Laws of 2018, item 1712)</p>	<p>The legal obligation incumbent on SSSE S.A. pursuant to Article 6(1)(c) of the GDPR in connection with the provisions of Article 13 (1) of the Act of 10 May 2018 on the promotion of new investments (Journal of Laws of 2018, item 1162) in the area assigned to that area administrator in accordance with the regulation issued pursuant to Article 5(3) of the Act in conjunction with §1 of the Regulation of the Minister of Entrepreneurship and Technology of 29 August 2018 on entrusting the administrator of the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] with the power to issue decisions on support and to control the implementation of decisions on support (Journal of Laws of 2018, item 1712)</p>	-
4.	<p>ENTREPRENEUR'S CONTROL of the implementation of the conditions of the permit (1) and summary inspections ordered by</p>	<p>The legal obligation incumbent on SSSE S.A. pursuant to Article 6(1)(c) of the GDPR, in connection with the provisions of</p>	-

	<p>the Minister of Entrepreneurship and Technology (2) Process <u>prior</u> to the entry into force of the Act on promoting new investments:</p> <p>Implementation (to the extent of control obligations) of the provisions of the Act on special economic zones i.e. dated 11 May 2017 (Journal of Laws of 2017, item 1010) and the Regulations of the Minister of the Economy of 2 July 2009 on entrusting the Suwalska Specjalna Strefa Ekonomiczna S.A. with the power to grant permits to conduct business activities in the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] and to control the fulfillment of permit conditions (Journal of Laws of 15 July 2009, as amended)</p>	<p>Article 18 of the Act on special economic zones i.e. dated 11 May 2017 (Journal of Laws of 2017, item 1010) in relation to §2 of Regulation of the Minister of the Economy of 2 July 2009 on entrusting the Suwalska Specjalna Strefa Ekonomiczna S.A. with the power to grant permits to conduct business activities in the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] and to control the fulfillment of permit conditions (Journal of Laws of 15 July 2009, as amended)</p>	
5.	<p>ENTREPRENEUR'S CONTROL Process <u>after</u> the entry into force of the Act on promoting new investments:</p> <p>Implementation (to the extent of control obligations) of the provisions of the Act of 10 May 2018 on the promotion of new investments (Journal of Laws of 2018, item 1162) in the area assigned to that area administrator in accordance with the regulation issued pursuant to Article 5(3) of the Act in conjunction with §1 par. 2 of the Regulation of the Minister of Entrepreneurship and Technology of 29 August 2018 on entrusting the administrator of the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] with the power to issue decisions on support and to control the implementation of decisions on support (Journal of Laws of 2018, item 1712)</p>	<p>The legal obligation incumbent on SSSE S.A. pursuant to Article 6(1)(c) of the GDPR in connection with the provisions of Article 22 of the Act of 10 May 2018 on the promotion of new investments (Journal of Laws of 2018, item 1162) in the area assigned to that area administrator in accordance with the regulation issued pursuant to Article 5(3) of the Act in conjunction with §1 par. 2 of the Regulation of the Minister of Entrepreneurship and Technology of 29 August 2018 on entrusting the administrator of the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] with the power to issue decisions on support and to control the implementation of decisions on support (Journal of Laws of 2018, item 1712)</p>	-

6A.	<p>MONITORING and REPORTING, i.e. the process of fulfilling the obligations formulated by the Minister of Entrepreneurship and Technology with respect to granted permits</p> <p>Process <u>prior</u> to the entry into force of the Act on promoting new investments:</p>	<p>The legal obligation incumbent on SSSE S.A. pursuant to Article 6(1)(c) of the GDPR, in connection with the provisions of Article 18 of the Act on special economic zones i.e. dated 11 May 2017 (Journal of Laws of 2017, item 1010, as amended) in relation to §3 of Regulation of the Minister of the Economy of 2 July 2009 on entrusting the Suwalska Specjalna Strefa Ekonomiczna S.A. with the power to grant permits to conduct business activities in the Suwalska Specjalna Strefa Ekonomiczna [Suwałki Special Economic Zone] and to control the fulfillment of permit conditions (Journal of Laws of 15 July 2009, as amended)</p>	-
6B.	<p>MONITORING and MONTHLY REPORTING-pertaining to the RECORDS OF SUPPORT FOR NEW INVESTMENT, that is, the process of fulfilling obligations formulated by the Ministry of Entrepreneurship and Technology within the scope of the Act on support for new investments.</p> <p>Process after the entry into force of the Act on promoting new investments:</p> <p>Implementation of the provisions of the Act on promoting new investments (Journal of Laws 2018, item 1162) Articles 29-34</p>	<p>The legal obligation incumbent on SSSE S.A. pursuant to Article 6(1)(c) of the GDPR, in connection with the provisions of Articles 29-34 (Chapter 5) of the Act on promoting new investments (Journal of Laws of 2018, item 1162)</p>	-
7.	<p>SCHOLARSHIP PROGRAM: Implementation of the scholarship program and granting of scholarships to selected individuals</p>	<p>Consent of the data subject i.e. Article 6(1)(a) of the GDPR</p>	-
8.	<p>GIVING DONATIONS: Implementation of the donation agreement</p>	<p>Consent of the data subject i.e. Article 6(1)(a) of the GDPR</p>	-

9.	HANDLING OF CONTRACTS CONCLUDED/GATHERING OF PARTIES TO EXECUTED CONTRACTS and individuals whose personal data was obtained, either directly or indirectly, in connection with the performance of such contracts: Implementation of contracts	As the case may be, the legal bases can be: (a) Article 6(1)(a) of the GDPR - Consent of the data subject (b) Article 6(1)(b) of the GDPR - performance of a contract to which the data subject is a party (c) Data sharing (the Controller does not perform any operations on the data on behalf of the Controller)	-
10	TENDERS AND REQUESTS FOR PROPOSAL: Organizing a tender/issuing a Request for Proposal and select a contractor to execute the contract	Art. 6(1)(f) of the GDPR - legitimate interest of the Controller	Organizing a tender/issuing a Request for Proposal and select a contractor to execute the contract

IV. Data Recipients

We may transfer your personal data to other entities that will process it, i.e.:

1. entities providing services to the Controller in connection with conducting recruitment processes, such as recruitment agencies, as well as providers of IT systems and services.

2., 3.,4,5 To the following entities:

- Minister of Entrepreneurship and Technology
- entities conducting postal or courier services,
- banks, in case they need to conduct settlements,
- state authorities or other entities entitled under the provisions of law, in order to fulfill the obligations imposed on SSSE S.A. (Tax Office, State Labor Inspectorate, Social Insurance Institution)
- entities supporting SSSE S.A. in its operations on behalf of SSSE S.A., in particular, suppliers of external systems supporting operations, entities providing accounting, HR and payroll services, legal services,
- IT system and service providers.

6A. To the following entities:

- Minister of Entrepreneurship and Technology
- IT system and service providers.

6B. To the following entities:

- Minister of Entrepreneurship and Technology
- IT system and service providers.

7.To the following entities:

- banks, in case they need to conduct settlements,
- state authorities or other entities entitled under the provisions of law, in order to fulfill the obligations imposed on SSSE S.A. (Tax Office)
- IT system and service providers.

8. To the following entities:

- banks, in case they need to conduct settlements,
- state authorities or other entities entitled under the provisions of law, in order to fulfill the obligations imposed on SSSE S.A. (Tax Office)
- IT system and service providers.

9,10. To the following entities:

- entities conducting postal or courier services,
- banks, in case they need to conduct settlements,

- state authorities or other entities entitled under the provisions of law, in order to fulfill the obligations imposed on SSSE S.A. (Tax Office, State Labor Inspectorate, Social Insurance Institution)
- entities supporting SSSE S.A. in its operations on behalf of SSSE S.A., in particular, suppliers of external systems supporting operations, entities providing accounting, HR and payroll services, legal services,
- IT system and service providers.

Personal data may be transferred to third countries (transferred outside the European Economic Area) in connection with technical solutions used by the Controller. In this case, the Controller shall provide adequate safeguards by entering into an agreement based on the Standard Contractual Clauses approved by the European Commission or under the Binding Corporate Rules, or using an entity participating in the Privacy Shield Program. A copy of the safeguards in place can be obtained by contacting the Controller at the addresses indicated in Section II.

Personal data will not be sold.

V. Data retention period

The Controller is obliged to keep documents containing data for the periods required by applicable laws or when necessary for proper operation and accountability.

Data will be kept for the periods indicated below:

No.	Name of process	Data retention time
1.	RECRUITMENT PROCESS	Until the end of the current recruitment process, and to the extent that the processing is based on consent - until its withdrawal, and in the case of consent to process data for future recruitment, the data will be processed for no longer than 3 years. The period of processing may be extended in each case by the period of the statute of limitations for claims, if the processing of your personal data is necessary for the establishment or assertion of possible claims or defense against such claims by the Controller. After this period, data will be processed only to the extent and for the time required by law.
2.	INVESTOR ACQUISITION PROCESS (Process <u>prior to</u> the entry into force of the Act on promoting new investments):	Until: 1. the statute of limitations has lapsed on claims related to the repayment of public aid granted to the entrepreneur in the form of tax exemption (conducted by tax authorities and tax inspection offices) - as a rule, 6 years from the end of the tax year to which they relate, 2. it is possible to control the fulfillment of the conditions of the granted permits - for the duration of the validity of the permit and the conduct of business, 3. it is possible to control the conformity of the aid with the rules of the common market (conducted by the European

		Commission) - a 10-year limitation period counting from the end of the calendar year in which the entrepreneur used the aid.
3.	INVESTOR ACQUISITION PROCESS (Process <u>after</u> the entry into force of the Act on promoting new investments):	<p>Until:</p> <ol style="list-style-type: none"> 1. the statute of limitations has lapsed on claims related to the repayment of public aid granted to the entrepreneur in the form of tax exemption (conducted by tax authorities and tax inspection offices) - as a rule, 6 years from the end of the tax year to which they relate, 2. it is possible to control the fulfillment of the conditions of the granted decision on support - for the duration of the validity of the decision and the conduct of economic activity, 3. it is possible to control the conformity of the aid with the rules of the common market (conducted by the European Commission) - a 10-year limitation period counting from the end of the calendar year in which the entrepreneur used the aid.
4.	<p>ENTREPRENEUR'S CONTROL of the implementation of the conditions of the permit (1) and summary inspections ordered by the Minister of Entrepreneurship and Technology (2)</p> <p>Process <u>prior to</u> the entry into force of the Act on promoting new investments:</p>	<p>Until:</p> <ol style="list-style-type: none"> 1. the statute of limitations has lapsed on claims related to the repayment of public aid granted to the entrepreneur in the form of tax exemption (conducted by tax authorities and tax inspection offices) - as a rule, 6 years from the end of the tax year to which they relate, 2. it is possible to control the fulfillment of the conditions of the granted permits - for the duration of the validity of the permit and the conduct of business, 3. it is possible to control the conformity of the aid with the rules of the common market (conducted by the European Commission) - a 10-year limitation period counting from the end of the calendar year in which the entrepreneur used the aid.
5.	<p>ENTREPRENEUR'S CONTROL Concerning control of the implementation of the conditions contained in the decision on support. Process <u>after</u> the entry into force of the Act on promoting new investments:</p>	<p>Until:</p> <ol style="list-style-type: none"> 1. the statute of limitations has lapsed on claims related to the repayment of public aid granted to the entrepreneur in the form of tax exemption (conducted by tax authorities and tax inspection offices) - as a rule, 6 years from the end of the tax year to which they relate, 2. it is possible to control the fulfillment of the conditions of the granted support decision - for the duration of the validity of the support decision and the conduct of economic activity,

		3. it is possible to control the conformity of the aid with the rules of the common market (conducted by the European Commission) - a 10-year limitation period counting from the end of the calendar year in which the entrepreneur used the aid.
6A.	MONITORING and QUARTERLY REPORTING, i.e. the process of fulfilling the obligations formulated by the Minister of Entrepreneurship and Technology with respect to granted permits Process <u>prior to</u> the entry into force of the Act on promoting new investments:	Until: it is possible to control the fulfillment of the conditions of the granted permit - for the duration of the validity of the permit and the conduct of business activities
6B.	MONITORING and MONTHLY REPORTING-pertaining to the RECORDS OF SUPPORT FOR NEW INVESTMENT, that is, the process of fulfilling obligations formulated by the Ministry of Entrepreneurship and Technology within the scope of the Act on support for new investments. Process after the entry into force of the Act on promoting new investments:	Until: it is possible to control the fulfillment of the criteria contained in the granted support decision - for the duration of the validity of the support decision and the business activity
7.	SCHOLARSHIP PROGRAM	Data of candidates for the scholarship - until the Controller decides to whom it will be awarded. Scholarship recipient's data - until the statute of limitations for claims under the scholarship agreement has lapsed.
8.	GIVING DONATIONS	Data of applicants for donation - until the Controller decides to whom it will be granted or revokes or withdraws consent. Data of the recipient of the donation - until the revocation or cancellation of consent, but no later than the statute of limitations for claims under the donation agreement.
9.	HANDLING OF CONTRACTS CONCLUDED/GATHERING OF PARTIES TO EXECUTED CONTRACTS and individuals whose personal data was obtained, either directly or indirectly, in connection with the performance of such contracts:	<ul style="list-style-type: none"> • In the case of data processing on the basis of consent - until the purpose is achieved or the consent is withdrawn; • No later than until the lapse of the statute of limitations for contractual claims and the statute of limitations for tax liability
10.	TENDERS AND REQUESTS FOR PROPOSAL	Whichever term is longer or applies: until the expenditure of funds is audited and procedures are followed, or until the statute of limitations on claims arising from executed contracts has lapsed

Data that is not necessary for the purposes is deleted or anonymized.

Any consent given can be withdrawn at any time. Withdrawing consent does not affect the legality of the processing carried out prior to the withdrawal. For evidentiary purposes, the Controller requests withdrawal of consents by written or electronic mail to the address indicated in Section II.

VI. Rights with respect to processed data and voluntary provision of data

Every data subject has the right to:

- (a) access to the content of their data and
- (b) the right to rectify it,
- (c) remove the data,
- (d) limit its processing,
- (e) the right to data portability,
- (f) the right to object,
- (g) The right to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal (as long as the processing is based on consent).

You also have the right to lodge a complaint with the data protection supervisory authority if you consider that the processing of your personal data violates the provisions of Regulation 2016/679.

Provision of data is voluntary, but necessary to fulfill the purpose for which the data is provided.

VII. In what situations can you object to the processing of your data?

You have the right to object to the processing of personal data concerning you when:

- the processing of personal data is carried out on the basis of a legitimate interest or for statistical purposes, and the objection is justified by your particular situation,
- Your personal data is processed for direct marketing purposes, including being profiled for this purpose.

VIII. Security:

The Controller, as the owner of the site, ensures that he makes every effort to protect the privacy of people using its services. To this end, the Controller shall process personal data in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures. For detailed information regarding the lawful, fair and transparent processing of your personal data in the course of using our services, please refer to the document , "Privacy Policy" available at: www.ssse.com.pl.

IX. Processing of personal data by automated means (including by profiling)

Your personal data may be processed by automated means (including by profiling), but this will not have any legal effect on you or similarly significantly affect your situation. Profiling of personal data by the Controller consists in the processing of your data (including by automated means), by using it to evaluate certain information about you, in particular to analyze or forecast your personal preferences and interests related to the services provided by the Controller.

As part of its activities, the Controller uses cookies in such a way that it observes and analyzes traffic on www.ssse.com.pl.