



## PERSONAL DATA PROTECTION POLICY FOR B2B CUSTOMERS

The personal data protection policy for B2B customers applies to clients who conduct transactions with us as part of business or professional activities, including corporate, business, institutional clients, and advertising agencies. It specifies the type of personal data we collect from you as a B2B client, the purposes for which it is done, how we use it, who we are, and what rights you have.

### 1. PERSONAL DATA ADMINISTRATOR - CONTACT:

We inform you that the administrator of your personal data is OCHNIK S.A. located in the Garwolin, address: 8B Stacyjna Street, 08-400 Garwolin, Poland registered in the business registry maintained by the District Court for m.st. Warsaw in Warsaw, XIV Economic Department of the National Court Register under KRS number 0000604045, NIP 826-000-07-80, REGON: 005176399, with a share capital of PLN 8,090,500 (hereinafter "We").

You can contact us:

- by mail at the address: OCHNIK S.A., 8B Stacyjna Street, 08-400 Garwolin, Poland;
- by email at: [rodo@ochnik.com](mailto:rodo@ochnik.com)

### DATA PROTECTION OFFICER AND HIS CONTACT DETAILS:

2. We have appointed a Data Protection Officer whom you can contact with any questions or requests in all matters concerning personal data. You can do this:
  - by mail at the address: OCHNIK S.A. Data Protection Officer, 8B Stacyjna Street, 08-400 Garwolin, Poland;
  - by email at: [inspektorochronydanych@ochnik.com](mailto:inspektorochronydanych@ochnik.com)

### WHAT DATA WE PROCESS IN B2B AND WHERE WE GET IT FROM:

3. We process your personal data that we have obtained from you in connection with transactions made with us, confirmed by issued VAT invoices or from publicly available sources including CEIDG, KRS, REGON, or other registers and records maintained by public administration bodies. We also process the bank account number from which payments were made or to which refunds were made.

Additionally, we also process your behavioral data, i.e., data regarding your behavior including: transactions made, complaints, correspondence history, and contacts with us, activity on our website and online store, our profiles on social media platforms (e.g., Facebook), our accounts on third-party websites (e.g., Allegro). These include data such as: viewed products, IP addresses, device identifiers, data from cookies, and locations, correspondence, contacts, as well as opinions about us and our products and services.

For the purposes of establishing, pursuing, and defending claims, we may also collect data concerning your PESEL or NIP number and residence address from publicly available sources including CEIDG, KRS, REGON, or other registers and records maintained by public administration bodies.

### FOR WHAT PURPOSE DO WE ACQUIRE YOUR DATA AND ON WHAT BASIS DO WE USE IT, AND FOR HOW LONG?

4. Your personal data is necessary for us and is processed by us for the purpose of:
  - taking actions at your request before concluding a contract (e.g., making a valuation or notifying about product availability) – Article 6(1)(b) GDPR
    - for the time necessary to perform these actions;

- concluding and executing the contract – Article 6(1)(b) GDPR
  - for the time necessary to perform the contract and make settlements under it;
- fulfilling the legal obligations incumbent on us – legal basis Article 6(1)(c) GDPR including, among others:
  - (i) obligations under the warranty for defects
    - for the period of liability under warranty;
  - (ii) obligations related to withdrawal or termination of the contract
    - for the time of performing obligations under these titles;
  - (iii) obligations related to the issuance and storage of invoices and documents required by tax law and accounting regulations
    - until the issuance of the invoice or other documents and then for the period of their storage specified by tax and accounting regulations;
  - (iv) storing data to demonstrate the fulfillment of the accountability obligation and other arising from data protection regulations
    - for the period of liability under this title;
- realization of our so-called legitimate interests – legal basis Article 6(1)(f) GDPR - occurring in case of:
  - (i) establishing, defending, pursuing claims
    - until the limitation of claims under the contract or our actions related to the contract or requests before its conclusion (maximum 10 years from the execution of the contract or requests before its conclusion or issuance of a final court decision);
  - (ii) creating compilations, analyses, and statistics for our internal needs including, in particular, reporting, research, and planning the development of our products, including services, and improving their quality, development work in our IT systems
    - for the period of activities before concluding a contract and until the execution of the contract, and then no later than the limitation of claims under this contract or our actions related to the contract or requests before its conclusion;
  - (iii) ensuring network and information security
    - for the entire period of data storage, i.e., until the limitation of claims under the contract or our actions related to the contract or requests before its conclusion and the cessation of our liability under the accountability obligation and other imposed by data protection regulations;
  - (iv) supporting customer service including by adjusting it to the needs arising from the orders made, complaints, grievances, requests – for the duration of the contract or until the completion of actions taken at the request before the conclusion of the contract;
  - (v) for marketing purposes including profiling, i.e., to convey information about our promotions, products including services, events, campaigns including special offers – for the duration of the contract until its execution;
  - (vi) protection against fraud attempts – for the duration of proceedings on the subject.

We may also process your data based on:

- the consent given to us for the purposes specified therein (including, for example, based on consent to the processing of your data after the execution of the contract or before its conclusion for marketing purposes including profiling)
  - until the withdrawal of consent and after withdrawing consent
  - until the limitation of claims under our actions taken on its basis and cessation of our liability under the accountability obligation and other imposed by data protection regulations for the purpose of establishing, defending, or pursuing these claims, creating compilations, analyses, and statistics for our internal needs, ensuring network and information security (i.e., for the realization of our so-called legitimate interests – Article 6(1)(f) GDPR) and demonstrating the fulfillment of the accountability obligation and others imposed by data protection regulations (i.e., for the realization of a legal obligation – Article 6(1)(c) GDPR).

QCHNIK