

## Privacy Policy

how we protect and process personal data and how the data can be modified

We trade as Adam Fijak VSL-System, VAT ID-No. (NIP) PL6792581813, registered office: al. Jerozolimskie 85/21, 02-001 Warsaw.  
The company is a controller of personal data that is given by you at the time of signing the agreement and is collected from other sources.  
This document describes data storage methods, data recipients, and rules for data modification or erasure.

### Purpose and basis of the use of personal data and data storage period

- 1) Personal data was obtained at the time of agreement signing from the signatory/signatories and collected from generally available sources (National Court Register/Central Record of Business Activities) and is used to perform our agreement and make financial settlements thereunder.
- 2) We use the personal data to fulfil our accounting and legal obligations, including invoicing income under the agreement, sending invoices via the Internet.
- 3) We also use the personal data to issue and deliver other accounting documents at your requests, e.g. KP (cash received), duplicate invoices.
- 4) We will use the personal data:
  - a) until the expiry of our agreement to the extent necessary to perform this agreement;
  - b) for the lawfully necessary period of data storage, for example for tax purposes or for the purpose of administrative or court proceedings, etc.;
  - c) for the period during which it is possible to make claims under unpaid invoices.

### Data collected by us to enter into the agreement

- 1) To enter into an agreement, we need the data of a company which is to enter into the agreement and personal data of the company's representative.
  - 2) This data includes generally available information recorded in the generally accessible CEiDG (Central Record of Business Activities) or KRS (National Court Register).
  - 3) Personal data of the company's representative includes a first name, surname, place of residence, ID card or passport number, PESEL (personal ID-No.), expiry date of the ID card or passport.
  - 4) The company's representative may send a scan of their ID card or passport and cover the data we do not collect or a transcript of personal data given in the ID card or passport that we collect.
  - 5) In addition to Appendix 6 to the agreement, the company's representative gives personal data of persons who will come to the personal data controller's office on the company's behalf to collect the company's correspondence. The data can be generally available data from the National Court Register or Central Record of Business Activities, e.g. first names, surnames, PESELS of directors, proxies, attorneys of the company or the data may concern another person. If the data of a person that is not disclosed in the National Court Register or Central Record of Business Activities is given, the consent of such a person must be presented. All data of third parties in relation to the parties to the agreement must be given provided that regulations on the personal rights of third parties are not violated.
  - 6) In addition to Appendix 8 to the agreement, the company's representative must give the company's e-mail and/or telephone number.
- During the term of the agreement, if the agreement covers scanning company correspondence, we obtain correspondence scans. Correspondence scans appear at our company as a result of the service you have chosen. The scans are not analysed. Although, given their nature, they are in a digital form (hereinafter referred to as electronic files).

Storage time: identical to the term of the agreement.

During the term of the agreement, we obtain information about correspondence incoming to your company. The information is not analysed but is stored in a digital form.

Storage time: identical to the term of the agreement.

### Recipients of your data

Your data is delivered to the following extent:

- 1) All data and electronic files: to the supplier of a hosting server where the database is kept, files are hosted and electronic mail is operated. We have entered into a data processing agreement with the supplier.
- 2) Only telephone number: if a subscription fee is not paid within the period set out in our agreement, the telephone number is transferred to the "paid text message gate" supplier to send a text message with a request for payment. We have entered into a personal data processing agreement with the supplier of the "paid text message gate" services.
- 3) All data and electronic files: our employees who have signed relevant confidentiality and personal data protection statements and have knowledge of personal data processing.
- 4) All data of your company: debt collectors or buyers, if you do not pay our invoices.
- 5) Only generally available data of the company (name, address, VAT ID-No., as simply visible on the invoice): entities providing book-keeping, accounting, tax, legal services to our company (at present there is only one entity of this type, which is our book-keeping bureau).
- 6) All data and electronic files: tax authorities, the police, special services, etc. at their request for the purpose of their proceedings.

### Personal data sharing

- 1) Personal data is processed by the aforementioned subcontractors solely on the basis of a written agreement which complies with applicable regulations.
- 2) The personal data will not be disclosed to any other persons or institutions, unless this is required by governing law or necessary to process the personal data subject to a relevant agreement which provides for the protection of rights, confidentiality and privacy.

### Other sources of your data

- 1) Your data is acquired from the Central Record of Business Activities and National Court Register.
- 2) If you pay our invoices via banks or other financial institutions, we obtain information about persons making the payment and numbers of bank accounts used for payment purposes. This data is only processed in order to refund an overpayment, if any, or at a request of state services, e.g. bailiffs, tax offices, the police, etc.

### Countries where your data is transferred

At present, all our subcontractors come from Poland and we do not plan to transfer your data outside Poland and the European Union.

### Data used for decision-making

During the performance of our agreement, we process the data concerning your payment or non-payment of fees stemming from the agreement. On this basis, it is possible that we will terminate the agreement and stop providing our services.

### Your rights to personal data and rules for rights exercising

- 1) Right to correct or erase the data:
  - a) electronically by logging in the website panel:  
<https://www.biurowirtualnewarszawa.pl/panelklienta/> moving to the tag Inne (Other) > Kontakt (Contact) and writing information about data you want to correct and new data in the text field;
  - b) electronically: by writing the information about data you want to correct and new data to any e-mail of our company on the website <http://www.biurowirtualnewarszawa.pl/> from your e-mail given in the agreement;
  - c) by registered mail: by writing the information about data you want to correct and new data to the address given on the website <http://www.biurowirtualnewarszawa.pl/>. The letter must be legibly signed by persons authorised to represent your company;
- 2) erasure of data that illegitimately processed: procedures described in Section 1 above;
- 3) restriction to data processing: procedures described in Section 1 above;
- 4) access to data: notifying of what data we have and making copies of data, procedures described in Section 1 above;
- 5) object to data processing to be reviewed by us: procedures described in Section 1 above;
- 6) complaint with the Chairman of the Personal Data Protection Office.

If you exercise the right to be forgotten or the right to restriction of processing because you object for reasons connected with special circumstances, please attach a description of such untypical circumstances or a statement set out by law.

**Data protection**

- 1) We use technical and organisational measures which ensure the protection of data processing adequately to the risks.
- 2) In the case of data kept in a physical form, this is an anti-theft door, an alarm and monitoring by a security company.
- 3) In the case of data kept electronically in the server, these are a login and a password, as well as data transmission encrypting with SSL certificates. We make backup data of copies on a regular basis.
- 4) In the case of data kept electronically in PCs or laptops, computers are protected with a login and password, a firewall and antivirus software.
- 5) All laptops are used as PCs and are never taken out of our company's premises.

Cookies on <http://www.biurowirtualnewarszawa.pl/>

A document available at

<http://www.biurowirtualnewarszawa.pl/formularze/ciasteczka.pdf>

( in English : <http://www.biurowirtualnewarszawa.pl/english/formularze/cookies.pdf> )

constitutes an integral part of this Privacy Policy.

**Amendments to the Privacy Policy**

We reserve the right to amend this document, provided that your rights hereunder will not be restricted without your consent.

**Contact data**

Contact data of our company is published on the following website: <http://www.biurowirtualnewarszawa.pl/> and in the generally available Central Record of Business Activities under the VAT ID-No. (NIP) PL6792581813. As at 14 May 2018, this data is as follows:

**VSL-System**

Al. Jerozolimskie 85 suite 21

02-001 Warsaw

E-mail: [info@vsl-system.pl](mailto:info@vsl-system.pl)

ul. Mazowiecka 11 suite 49

00-052 Warszawa

E-mail: [mazowiecka@vsl-system.pl](mailto:mazowiecka@vsl-system.pl)

Direct contact with the Controller:

[administrator@danychosobowych@vsl-system.pl](mailto:administrator@danychosobowych@vsl-system.pl)