



## PRIVACY NOTICE

### for individuals entering the premises of Grupa Azoty Spółka Akcyjna

This notice is intended for individuals entering the premises of Grupa Azoty S.A. (“you”). Your personal data will be collected in connection with the 24-hour surveillance monitoring of the premises controlled by Grupa Azoty S.A., including the access control and video surveillance systems operated at Grupa Azoty S.A. Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th 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 (“GDPR”), we would like to inform you that:

- 1) the controller of your personal data is Grupa Azoty Spółka Akcyjna with its registered office at ul. E. Kwiatkowskiego 8, 33-101 Tarnów, Poland, entered in the Business Register maintained by the District Court for Kraków-Śródmieście in Kraków, 12th Commercial Division of the National Court Register, under No. KRS 0000075450, Tax Identification Number (NIP): 873-000-68-29, BDO: 000012833 and Industry Identification Number (REGON): 850002268 (“**Grupa Azoty S.A.**” or “**Controller**”). You can contact the Controller by email at the following address: [tarnow@grupazoty.com](mailto:tarnow@grupazoty.com) or by letter at the following address: Grupa Azoty Spółka Akcyjna, ul. Kwiatkowskiego 8, 33-101 Tarnów, Poland.
- 2) For matters related to the protection of personal data at the Company, you can contact the Data Protection Officer at the following email address: [iod.tarnow@grupazoty.com](mailto:iod.tarnow@grupazoty.com) or by letter at the following address: Inspektor Ochrony Danych (Data Protection Officer), Grupa Azoty Spółka Akcyjna, ul. E. Kwiatkowskiego 8, 33-101 Tarnów, Poland.
- 3) Your personal data will be processed:
  - a. to comply with a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR);

processing is often necessary for compliance with legal obligations to which the Controller is subject, or is expressly required by law. The key regulations under which the Controller will process your personal data are the following:

    - Protection of People and Property Act;
    - provisions on the prevention of acts prohibited by law; and
    - other provisions imposing obligations, guidelines or recommendations issued by authorised public authorities or institutions;
  - b. for the purposes of the legitimate interests of the Controller (Article 6(1)(f) of the GDPR);

processing may be deemed necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms (Article 6(1)(f) of the GDPR). When processing personal data on this basis, we always seek to strike a balance between our legitimate interests and your privacy, and we analyse the risk

of violating your rights or freedoms as well as the applied personal data protection measures. Examples of such legitimate interests are as follows:

- ensuring the safety and security of persons entering the premises of Grupa Azoty S.A.;
  - ensuring the safety and security of property located on the premises of Grupa Azoty S.A.;
  - ensuring the confidentiality of information protected under law;
  - attaining internal administrative purposes of the Controller, including statistical purposes;
  - handling complaints and enquiries;
  - establishment, exercise or defence of claims under civil law by the Controller in the course of its business activities.
- 4) We will process the following personal data: first name, surname, address, Personal Identification Number (PESEL) or identity document number, image recorded in the surveillance monitoring system, and other data indirectly enabling identification of the data subject (such as vehicle registration number).
- 5) We will collect your personal data either from you or from natural persons providing your personal data during the pass issuance process. In the case of video surveillance, personal data will be collected automatically by recording the image and other data enabling identification of a person by the surveillance system.
- 6) Disclosure or transfer of your personal data may be necessary for the performance of a contract concluded by Grupa Azoty S.A. Such disclosure or transfer may be made to the following entities:
- a. Other firms which are part of the Grupa Azoty Group;
  - b. providers of personal and property protection services, including video surveillance services;
  - c. providers of ICT and surveillance systems used by Grupa Azoty S.A. in the process, as well as providers of maintenance services for such systems;
  - d. providers of advisory and audit services and law firms providing legal services to the Grupa Azoty S.A.;
  - e. other entities operating on the Grupa Azoty S.A.'s premises which under surveillance
- 7) Video recordings may also be handed over to competent authorities, including, without limitation, to the police, prosecutors or courts, where the Company is required to do so under applicable laws or for the purpose of exercising or defending claims.
- 8) Your personal data will only be processed for the specific purposes defined by the Controller. Processed personal data will be erased as soon as the purpose of the processing has been attained. We will process your personal data for the following purposes for the period of time specified below.

Purpose of processing	Description of the purpose of processing	Legal basis for processing	Processing period
Safety and security	Your personal data is processed to ensure the security and safety of people and property,	legitimate interests of the Controller (Article 6(1)(f) of the GDPR)	Data necessary for the issue of a pass: two years after the return of the pass.
Surveillance monitoring of the Grupa Azoty S.A.'s premises and its surrounding area	Your personal data is processed through video surveillance of the plant and its grounds	legitimate interests of the Controller (Article 6(1)(f) of the GDPR)	Data from video surveillance: maximum three months
Provision of personal data to public authorities	Your data may be handed over to competent public authorities, including, without limitation, the police, prosecutors and courts, where Grupa Azoty S.A. is required to do so under applicable laws	Legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR);	Until final conclusion of the proceedings
Handling enquiries	Your personal data is processed in order for the Controller to respond to your enquiries	Legitimate interests of the Controller (Article 6(1)(f) of the GDPR)	Until conclusion of the procedure

Notwithstanding the above periods, your data may be processed by the Controller to establish, exercise or defend claims under civil law in the course of its business activities for the relevant limitation periods (generally, not longer than six years from the event giving rise to the claim).

The Controller may store copies of video surveillance recordings in the cases referred to in item 7 above until the final conclusion of the proceedings.

9) You have the right to:

- request access to your personal data;
- request that your personal data be rectified;
- request that your personal data be erased;
- request that the processing of your personal data be restricted;
- request transfer of your personal data;
- object to the processing of your personal data.

You should bear in mind that these rights are not absolute, and there are certain exceptions provided for in the applicable laws and regulations.

10) You have the right to lodge a complaint with the competent supervisory authority (in Poland it is the President of the Personal Data Protection Office) if you consider the processing of your personal data is in breach of the GDPR.

11) The provision of your personal data to the Controller is not expressly required by law and is voluntary. However, if you fail to provide it, you will be refused entry to Grupa Azoty S.A.'s premises.

12) This Notice was updated on October 16th 2018 and may be subject to further amendments. If required by law, all information regarding any future changes or additions to the processing of personal data described in this Notice that may concern you, will be provided to you via an appropriate communication channel that is customarily used by the Controller to contact you.