

## **GPEC GROUP PRIVACY POLICY**

Data confidentiality and the protection of our customers' privacy is a priority for us. Therefore, out of concern for the security of your data and respecting the applicable legal regulations, including those introduced in connection with the GDPR, we hereby present the privacy policy which specifies what data we collect, for what purpose, the principles of their processing as well as issues related to the cookie files. Should you have any questions, please contact the GPEC Group Data Protection Officer.

### **PERSONAL DATA CONTROLLER**

The administrator of your personal data is Gdańskie Przedsiębiorstwo Energetyki Ciepłej Sp. z o.o. with its registered office in Gdańsk (GPEC), 159B Słowackiego Street. The company operates within the structures of the GPEC Group, which consists of the following entities: GPEC, GPEC SYSTEM Sp. z o.o. based in Gdańsk, GPEC PROJEKT Sp. z o.o. based in Gdańsk, GPEC TERMO Sp. z o.o. based in Sopot, GPEC ENERGIA Sp. z o.o. based in Gdańsk, GPEC EKSPERT Sp. z o.o. based in Gdańsk, GPEC PRO Sp. z o.o. based in Gdańsk, GPEC PELPLIN Sp. z o.o. based in Pelplin. Accordingly, your personal data will be transferred to a co-administrator within the GPEC Group for the purpose for which they are being processed.

### **PRINCIPLES FOR PROCESSING OF PERSONAL DATA**

#### **Purpose of processing personal data**

Using the website [www.grupagpec.pl](http://www.grupagpec.pl), you will be able to make your declaration of connection to the GPEC district heating network. Once you have completed the declaration form on the website, it will be forwarded to us for further analysis of the possibilities regarding connection to the district heating network or to another heat source. In addition, we provide you with a contact form at [www.grupagpec.pl](http://www.grupagpec.pl) by means of which you can contact our Customer Service. Your data is then processed in order to respond to the enquiry addressed through the website. Completion of both the connection and contact forms requires a minimum of personal data, i.e. your name and surname as well as your e-mail address and, for the connection form, additionally the name of the street, in order to verify the technical feasibility of the connection.

You can also contact us via Facebook and the GPEC Group fanpage. In this case, your data will be processed in order to respond to the request addressed through this communication channel and the data subject to processing is the data from your public Facebook profile.

In addition, you can also receive a newsletter with information about the latest news and events. It is then necessary to provide your e-mail address in order to subscribe to the GPEC Group newsletter.

Please note, however, that your provision of the above-mentioned data is voluntary, but necessary in order to analyse the possibility of connection to the district heating network or another heat source (connection form), to respond to an enquiry (contact form), to subscribe to the newsletter and, if you have given your separate marketing consent, to promote and advertise the GPEC Group's products and services.

#### **Rights of persons whose data is processed**

You have the right to request access to your personal data, its rectification, erasure or restriction of processing, the right to object to the processing, and the right to have your data ported.

At the same time, we would like to inform you that you have the right to lodge a complaint to the supervisory authority, i.e. the Office for Personal Data Protection.

#### **Information on data processing in respect of the connection form:**

The data will be processed in order to take action at the request of the data subject prior to the conclusion of the contract on the basis of Article 6(1)(b) of the European Parliament and Council Regulation (EU)

2016/679 or on the basis of your consent (Article 6(1)(a) of the European Parliament and Council Regulation (EU) 2016/679) in case you wish to receive promotional and advertising information. In the event of connection, your personal data will be processed for a period of up to 10 years from the end of the calendar year in which the contract ends. If a connection agreement is refused, the data shall be processed for the purpose of realising potential claims referred to in the Polish Energy Law of 10 April 1997 for the period indicated in the aforementioned legal act. In the case of the processing of personal data on the basis of consent, data shall be stored until such consent is withdrawn. The subject consent can be withdrawn at any time by contacting the Customer Service bok@gpec.pl. Recipients of the data may be entities providing marketing services to the GPEC Group.

**Information on data processing in connection with the contact form:**

The data will be processed on the basis of your consent (Article 6(1)(a) of the European Parliament and Council Regulation (EU) 2016/679). Your personal data will be processed until you withdraw your consent. You can withdraw your consent at any time by contacting Customer Service bok@gpec.pl. Data recipients may be entities operating the GPEC Group website. Recipients of the data may be entities providing marketing services to GPEC Group.

**Information on data processing in connection with the newsletter:**

The data will be processed on the basis of your consent (Article 6(1)(a) of the European Parliament and Council Regulation (EU) 2016/679). Your personal data will be processed until you withdraw your consent. You can withdraw your consent at any time by clicking on the opt-out link provided in each newsletter and by contacting the Customer Service. The recipients of the data may be the operators of the GPEC Group website.

**Information on data processing within the GPEC Group's Facebook fanpage:**

The Controller processes the personal data of the persons who subscribed to the fanpage by clicking on the "Like" or "Observe" icon; published their comment under any of the posts posted on the fanpage. We obtain your data from Facebook, from your public profile and fanpage posts on the Facebook online platform.

Personal data is processed for the following purposes:

- a) to operate a fanpage under the name of the GPEC Group on the social networking site Facebook, in accordance with the terms and conditions laid down by Facebook Inc. and to communicate through this page about our activities, to promote the various events we organise, to build and maintain a community associated with us and to communicate through the available Facebook functionalities (comments, chat, messages), which is our legitimate interest (basis of Article 6(1)(f) GDPR);
- b) for the possible establishment, investigation or defence of claims, which is our legitimate interest (basis of Article 6(1)(f) of the GDPR);
- c) for analytical purposes concerning analyses of the functioning, popularity, use of the fanpage, which is our legitimate interest (basis of Article 6(1)(f) GDPR);
- d) Your personal data may also be processed on the basis of your separately granted consent to the extent and for the purpose specified in the consent and for the duration until the consent is withdrawn (basis under Article 6(1)(a) GDPR);
- e) Your personal data may also be processed on the basis of statutory requirements (basis of Article 6(1)(c) of the GDPR) in order for the Controller to fulfil its legal obligations under the law..

The Personal Data Controller will process the following data:

- a) basic identification data (first and last name) as published on your own Facebook profile;
- b) data published by you on your Facebook profile;
- c) the anonymous statistical data on visitors to the fanpage available via the "Facebook Insights" function provided by Facebook in accordance with the non-amendable terms of use of the Facebook website, collected by means of cookies, each of which contains a unique user code which can be linked to the connection data of users registered on Facebook and which is downloaded and processed at the time the fanpage is opened.

### **Contact with the Data Protection Officer**

In case of any questions, you are welcome to contact the Data Protection Officer of the GPEC Group, which can be done by e-mail: [iod@gpec.pl](mailto:iod@gpec.pl) or by phone: 58 52 43 566, 58 52 43 600.

### **Further information**

Personal data may be made available to other authorized entities on the basis of the law, as well as to entities with whom the controller has entered into an agreement of entrustment of data processing in connection with the provision of services to the controller (e.g. a law firm, a software provider, an external auditor) and to the owner of the social network Facebook under the non-amendable data principles set out by Facebook available at <https://www.facebook.com/about/privacy>.

The controller shall not transfer the data outside the territory of Poland (EU) of the European Economic Area, subject to the transnational nature of the data flow within Facebook using contractual clauses approved by the European Commission and decisions of the European Commission declaring an adequate level of data protection for specific countries in accordance with the rules set out by Facebook at <https://www.facebook.com/about/privacy>.

The controller does not make automated decisions based on your personal data.

By managing the website [www.grupagpec.pl](http://www.grupagpec.pl) and the fanpage the GPEC Group reserves the right to make changes to this Privacy Policy at any time. The Privacy Policy will be updated by means of its publication on the website.