



## PRIVACY POLICY

Protecting your privacy is important to us. We make every effort to adequately protect your personal data and to transparently inform you of how we use them.

Therefore, bearing in mind the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (hereinafter: "RODO"), we would like to inform you about the principles of personal data processing.

### 1. Who is responsible for your personal data? (Personal data controller)

The administrator of your personal data is CVI Dom Maklerski sp. z o.o. (hereinafter: "**CVI DM**", "**Administrator**") with its registered office in Warsaw at Plac Europejski 2, 00-844 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the City of Warsaw in Warsaw, XII Commercial Division of the National Court Register under KRS number 0000424707.

### 2. How to contact Personal Data Controller?

In matters concerning the processing of your personal data by the Administrator, you may contact Personal Data Protection Officer via the dedicated e-mail address: [dane.osobowe@cvi.pl](mailto:dane.osobowe@cvi.pl)

### 3. On what basis and for what purpose do we process your personal data?

We undertake to process your personal data in a lawful manner lawfully on the basis of one of the following grounds and for the following purposes:

- 1) for the purpose of providing electronic services in terms of making the content on the website available to you on the basis of Article 6(1)(b) RODO (*necessity of processing for the performance of the contract*);
- 2) for analytical and statistical purposes on the basis of Article 6(1)(f) RODO (*the Administrator's legitimate interest in conducting analyses and preferences in order to correct the functionalities used and services provided*);
- 3) for the purpose of possibly establishing and investigating claims or defending against claims on the basis of Article 6(1)(f) RODO (*legitimate interest of the Administrator to investigate and defend against claims*);

**Accessibility of digital services.** As a service provider, the Administrator takes measures to ensure the accessibility of its services, including the website, in accordance with the provisions of the Act of April 26, 2024, on ensuring compliance with accessibility requirements for certain products and services by economic operators.



Detailed information regarding the website, including a description of the requirements met and any exemptions, is available on a dedicated subpage: <https://www.cvi.pl/dostepnosc>.

#### 4. What rights do you have over your personal data?

Under the provisions of the RODO, you have numerous rights in relation to your personal data. Below is a general description of your rights.

**Access to personal data.** You can exercise your right to access and obtain a copy of your data at any time.

**Correction and completion of data.** You have the right to request from the Administrator the immediate rectification of your personal data that is inaccurate, as well as to request the completion of incomplete personal data.

**Right to erasure.** You have the right to request the Administrator to delete your personal data immediately.

**Right to restrict processing.** You have the right to request the Controller to restrict processing.

**Right to object.** You have the right to object to the processing of your personal data, including where the Controller processes the data for legitimate interests. The Controller may disregard your objection if you demonstrate the existence of compelling legitimate grounds for the processing which override your interests, rights and freedoms, or grounds for establishing, asserting or defending claims.

**Right to withdraw consent.** To the extent that the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

**Right to data portability.** To the extent that your data is processed for the purpose of entering into and performing a contract or processed on the basis of consent and the processing is carried out by automated means - you have the right to receive from the Controller in a structured, commonly used machine-readable format your personal data that you have provided before or in the course of your cooperation with the Company. You also have the right to send this personal data to another controller.

**Right to complain.** You have the right to lodge a complaint about the processing of your personal data by the Administrator to the supervisory authority, which in Poland is the President of the Office for Personal Data Protection.

The rights referred to above (in addition to the right to complain) can be exercised by contacting the Data Protection Officer:



- 1) by directing traditional correspondence to the Administrator's address given above or;
- 2) via a dedicated email address: [dane.osobowe@cvi.pl](mailto:dane.osobowe@cvi.pl)

#### **5. Source of personal data**

The data is obtained directly from you.

#### **6. Provision of personal data**

Your direct provision of personal data is voluntary.

#### **7. With whom do we share your personal data?**

We may share your personal data with the following recipients or categories of recipients of your data:

- 1) To persons authorised by CVI DM - such as employees and associates of CVI DM, to whom access to your personal data is necessary.
- 2) Entities providing CVI DM with IT infrastructure.
- 3) Entities with whom CVI DM has entered into a contract for the entrustment of the processing of personal data including, in particular, internal auditors, law firms.

Whenever personal data is shared, CVI DM shall examine the legal basis for making such sharing.

#### **8. Transfer of personal data to third countries**

Where your personal data is transferred to third countries, i.e. recipients established outside the European Economic Area in countries which, according to the European Commission, do not provide an adequate level of data protection (third countries that do not provide an adequate level of protection), the Controller transfers the data using mechanisms that comply with applicable law, which include, inter alia, (1) the EU "Standard Contractual Clauses", (2) where the transfer is to a third country for which the European Commission has determined by decision that the third country meets an adequate level of protection. For more information on the existing safeguards implemented by the Controller to ensure that personal data is processed in accordance with the relevant legislation and on how to obtain a copy of the data or where to access the data, please contact us as indicated in point 2 above.

#### **9. How long do we keep your personal data?**

The Administrator shall make every effort to ensure that your personal data are processed adequately and for as long as necessary for the purposes for which they were collected. With this in mind, the Administrator shall keep your personal data for no longer than necessary to fulfil the purposes for which they were collected or, if



necessary, to comply with applicable law, in particular the period of performance of the contract and the period of limitation of claims.

#### **10. Automated decision-making**

The controller does not carry out automated decision-making, including profiling, based on the personal data provided.

#### **11. Changes to the Privacy Policy**

This Privacy Policy is subject to change or update, in particular if the need or obligation to make such changes arises from a change in applicable law, including changes in data recipients.

The policy is effective from 2 September 2022.