



INFORMATION

on the processing of personal data by VIA4 S.A. with its registered office in Mysłowice

Controller

The Controller* of your personal data is VIA4 S.A. with its registered office in Mysłowice, ul. Piaskowa 20, 41-404 Mysłowice NIP [VAT] 6342298951, www.via4.pl (hereinafter referred to as the Company).

In case of any questions regarding your personal data, you may contact the Data Protection Officer appointed in our company:

- By directing the correspondence to the address of the Company's registered office indicated above – preferably with the note "Personal data";
- By sending an e-mail to: iod@via4.pl;
- By phone at 32 76 27 512.

***The Controller**, in accordance with article 4 of the GDPR – is a natural or legal person, authority, unit or other entity, which independently or jointly with others determines the purposes and means of the processing of the personal data. Where the purposes and means of such processing are laid down in European Union (EU) or Member State law, a controller may also be designated or specific criteria for its designation may be laid down in EU or Member State law.

1. Supervisory authority

The supervisory authority in Poland is the Office for Personal Data Protection.

2. For what purposes do we process personal data and on what legal grounds?

Our company's processes various personal data of the following categories of persons: motorway users, including those from whom we collect tolls; employees; candidates for employment; contractors cooperating with us; or employees of contractors.

VIA4 S.A. processes your personal data for the following (primary) purposes:

- a) Handling of inquiries via the contact form at www.via4.pl
- b) Execution of legitimate interests of VIA4 S.A., i.e.:
 - i. Ensuring the safety of persons (first of all employees and users of the motorway) and property of the Company, which also applies to the monitoring used on the premises of the Company and the motorway route
 - ii. Claiming or defending the rights of VIA4 S.A.
 - iii. Handling of telephone calls to the emergency number
 - iv. Handling of road incidents with motorway users
 - v. Motorway tolls collection, in particular handling of events related to the lack of payment for motorway tolls
 - vi. Handling of reports submitted to the Ethics Officer
- c) Recruitment processes
- d) Employment of workers or entering into a civil-law relationship with natural persons
- e) Performance of contracts concluded with contractors

Personal data may also be processed for other (secondary) purposes, permitted by law, where the primary and secondary purposes are closely interlinked. In such cases, processing shall be for the



purpose of archiving, conducting audits, various investigations, analyses, implementation of internal and external control systems, including management controls, reporting obligations, settling disputes, conducting court cases, including preparatory proceedings referred to in the provisions of the Code of Penal Procedure or proceedings in cases of misconduct.

3. Personal data retention period

The period of your personal data processing depends on the purpose for which they have been collected and processed and on the legal regulations imposing on the Controller the obligation to store particular data which are personal data for a specified period of time indicated in the legal regulations, as well as on the retention period adopted in VIA4 S.A., unless they result directly from other legal regulations.

In relation to the personal data processed on the basis of:

- article 6 section 1, item a of the GDPR – data is stored until the consent is withdrawn or until the action to which it was granted is completed; unless the consent is withdrawn earlier or for the period indicated in the consent;
- article 6 section 1, item b of the GDPR – data is stored for the duration of the agreement and in the scope of tax data for the period specified in legal regulations;
- article 6 section 1, item c of the GDPR – data is stored for the period specified in the specific legal regulations, e.g. in relation to employee files – 50 years;
- article 6 section 1, item e of the GDPR – data is stored for the period of time during which toll collection activities are carried out on the motorway or for the period specified in legal regulations;
- article 6 section 1, item f of the GDPR – data is stored for the duration of the Controller's important legal interest, not longer than it may result from legal regulations.

4. Transmission of personal data to entities or bodies

Personal data may be transmitted to:

- a) State authorities empowered by law;
- b) Entities to whom data transmission is necessary due to settlements made in conjunction with the collection of motorway tolls;
- c) Depending on the purpose for which they are collected, i.e. the entities cooperating with VIA4 S.A. in the field of IT services, HR services, accounting, advisory services, legal services, training, provision of courier services, postal operator as well as Companies within capital groups to which the Company belongs;

Personal data shall not be transferred outside the EEA and shall not be subject to automated decision making, including profiling.

5. Provision of personal data

The provision of personal data, depending on the purpose for which the processing is carried out, may result from a statutory obligation, or from a contract, or may be a condition for the conclusion of a contract. The provision of data is voluntary, but the consequence of not providing it may be the impossibility to conclude an agreement, the difficulty in the implementation of a specific action or the impossibility to take a specific action, or due to the lack of providing personal data, taking other legally permitted actions by the Controller to protect its own legal interest.



6. Rights of data subjects

Every data subject shall have the right to:

- 1) Access to his or her personal data;
- 2) Rectify or erase his or personal data;
- 3) Obtain from the Controller restriction of processing where one of the following applies:
 - a. The accuracy of the personal data is contested by the data subject for a period enabling the controller to verify the accuracy of the personal data;
 - b. The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c. The Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d. The data subject has objected to processing pursuant to article 21 section 1 of the GDPR – object to processing – pending the verification whether the legitimate grounds of the controller override those of the data subject.
- 4) Data portability, where the processing is based on consent pursuant to article 6 section 1, item a of the GDPR or on a contract pursuant to article 6 section 1, item b of the GDPR;
- 5) Object on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on article 6 section 1, item e or f;
- 6) File a complaint to a supervisory authority.