

Information about the processing of personal data of Orange Polska bidders and their representatives having access to the Orange Polska Purchasing Platform

We inform you how we protect and process your personal data and about rights you have in accordance with the provisions of the General Data Protection Regulation (GDPR), i.e. 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 repealing Directive 95/46/EC. Please read the following information.

1. Who is this information addressed to?

If we write in this Information about 'bidders' of Orange Polska S.A., we mean a natural person, legal person or organisational unit not being a legal person to which the act grants legal capacity and having access to the Orange Polska Purchasing Platform. If we write in this Information about 'representatives', we mean persons representing bidders, having access to the Orange Polska Purchasing Platform and performing within this platform activities on behalf of the bidder.

This Information is addressed to:

- bidders of Orange Polska S.A. being natural persons conducting business activity,
- representatives.

In the case of selection within the purchasing process of a bidder with whom/which a purchase agreement is signed, the rules for the processing of your data will be determined in separate Information.

2. For what purpose and on what basis do we process your personal data?

We process your personal data to:

- send invitations to tender in active purchasing processes published by Orange Polska on the Orange Polska Purchasing Platform, allow you to take part in purchasing processes and to analyse offers in current and future purchasing processes – the legal basis for data processing is Orange Polska legitimate interest in connection with the provision by you of your data during the registration at the Orange Polska Purchasing Platform (Article 6(1)(f) of the GDPR);
- take actions necessary to sign and perform agreements on the basis of offers submitted (Article 6(1)(b) of the GDPR);
- verify the correctness and timeliness of data of bidders registered on the Orange Polska Purchasing Platform – the legal basis for data processing is Orange Polska legitimate interest in connection with the provision by you of your data during the registration at the Orange Polska Purchasing Platform (Article 6(1)(f) of the GDPR);
- verify the credibility of bidders and representatives, also to examine bidders' business background and legal and financial situation in order to protect economic and legal interests of Orange Polska S.A. – the legal basis for data processing is Orange Polska legitimate interest in connection with the provision by you of your data during the registration at the Orange Polska Purchasing Platform (Article 6(1)(f) of the GDPR);
- determine and pursue claims or to defend against them – the legal basis for data processing is Orange Polska legitimate interest (Article 6(1)(f) of the GDPR) consisting in the possibility to defend its economic interests by Orange Polska;
- create compilations, analyses and statistics for our internal purposes; it includes in particular

reporting, marketing research, planning of the development of services or network, development works in IT systems, creation of statistical models – the legal basis for data processing is Orange Polska legitimate interest in connection with the provision by you of your data during the registration at the Orange Polska Purchasing Platform (Article 6(1)(f) of the GDPR);

- demonstrate compliance of our activities with the provisions of law (the legal basis for data processing is our legitimate interest – Article 6(1)(f) of the GDPR).

The data will be processed:

- 1) for the period during which you will have an active account on the Orange Polska Purchasing Platform;
- 2) until administration authorities could impose on us a financial penalty for non-fulfilment of obligations resulting from the applicable provisions of law;
- 3) for the period of pursuing claims or defending against claims;
- 4) until the submission of an effective objection to data processing.

The provision of data is voluntary and does not constitute a statutory or contractual obligation, however it is necessary if you want to take part in purchasing processes published by Orange Polska on the Orange Polska Purchasing Platform.

3. Entities to which your personal

data may be transferred:

- entities who provide us with advisory, consulting, auditing and IT services and legal, tax and accounting assistance, research agencies acting on our behalf;
- entities to which we provide services or offer goods;
- subcontractors supporting us e.g. when we perform services or offer goods.

4. Data from other sources:

During purchasing procedures we may also collect personal data from other sources:

- information from an appropriate register of entrepreneurs (e.g. the Central Register and Information on Economic Activity (CEIDG), the National Court Register) and the database of the Central Statistical Office in the scope published there, and from entities professionally collecting and analysing information about entrepreneurs' economic situation and credibility in the scope made available by them, suppliers of search engines, from your generally available websites or web accounts – in order to verify your data and to create compilations and analyses – the legal basis for data processing is Orange Polska legitimate interest (Article 6(1)(f) of the GDPR).

5. Will your data go beyond the European Economic Area (EEA)?

Your data may be transferred outside the EEA (the EU, Norway, Liechtenstein and Iceland) in the manner provided for by law: under a decision of the European Commission stating the appropriate degree of protection, e.g. in the third country to which we transfer the data, or provided that appropriate safeguards are ensured, such as binding corporate rules (as defined in Art. 47 of the GDPR), standard data protection clauses adopted by the European Commission or a competent supervisory authority regarding personal data (Art. 46(2)(c) or (d) of the GDPR), an approved code of conduct (Art. 46(2)(e) of the GDPR), an approved certification mechanism (Art. 46(2)(f) of the GDPR), contractual clauses accepted by the competent supervisory authority (Art. 46(3) of the GDPR), as well

as in cases necessary due to the legitimate interests of the controller (provided that the requirements of the second paragraph of Art. 49(1) of the GDPR are met). You can obtain a copy of the above-mentioned safeguard on request.

More information about the transfer of personal data outside the EEA can be found at:
www.orange.pl/mojedane/transfer.

6. Your rights

You may request the following from us:

- rectification (correction of inaccurate data);
- erasure of data processed unlawfully or data placed on our websites;
- restriction of processing (suspending data operations or non-erasure of data – depending on the request);
- access to data (information about the data processed by us and a copy of the data);
- transfer of data to another data controller or to you.

You may exercise these rights by sending a written request to the following address:
Orange Polska S.A. ul. Jagiellońska 34, 96-100 Skierniewice

To be sure that we are handling your request addressed to us, we may ask you to provide additional information to authenticate the requesting party.

The scope of each of these rights and situations when they can be exercised result from the provisions of law. Your ability to exercise particular rights will depend, for example, on the legal basis for the use of your data and for the purpose of their processing.

7. Right to object

Regardless of the rights mentioned above, you may object at any time to the processing of your data. After receiving a relevant request, we are obliged to cease the processing of your data for this purpose.

In special situations you may object at any time to the processing of your personal data on the basis of our legitimate interest.

In such a situation, after considering your request, we will no longer be able to process on this basis the personal data to which you objected, unless we can demonstrate that there are:

- valid legally justified grounds for data processing, overriding your interests, fundamental rights and freedoms, or
- grounds for establishment, exercise or defence of legal claims.

8. Customer's

If the use of your data is not necessary for the contract performance/legal obligation or does not constitute our legitimate interest, we may ask you to consent to specific ways of data usage. Such consent may allow us to make the data available to other entities for the purposes of their promotional campaigns, automatic decision making based on your data and on your request, or the use of communication channels preferred by you. You can withdraw your consent at any time (which shall not affect the lawfulness of processing based on consent before its withdrawal).

9. Complaint

You have the right to file a complaint with the President of the Personal Data Protection Office if you believe that the processing of your personal data violates the provisions of law.

10. Contact and information

Our contact details/office address:

Orange Polska S.A. Al. Jerozolimskie 160 02-326 Warszawa

Our correspondence address (any requests to exercise your rights should be sent to this address):

Orange Polska S.A. ul. Jagiellońska 34, 96-100 Skierniewice

Contact details of the Data Protection Inspector in Orange Polska S.A.:
inspektorochronydanych@orange.com

For More Information

If you want to learn more about how we use and secure your data or about your rights, please visit:

www.orange.pl/mojedane