

PRIVACY POLICY

**Regarding performance of information obligations under Article 13
Regulation (EU) 2016/679 of the European Parliament and of the
Council of**

**April 27, 2016 on the protection of natural persons in
in connection with the processing of personal data and on the
free flow of such data and repealing Directive
95/46/WE**

**CREATIVE ANSWER SP. Z O.O.
NIP 5252384416 | REGON 140793911**

Clause for Contractors

Pursuant to Article 13 of the RODO (provided when data is collected from a data subject)

Respecting your privacy and ensuring that you know how your personal data is processed, here is a set of key information related to EU Regulation 2016/679, known as the General Data Protection Regulation ("GDPR"):

PERSONAL DATA CONTROLLER

The administrator of your personal data is Creative Answer Sp. z o.o., NIP: 5252384416, REGON: 140793911, E-mail contact: rodo@creativeanswer.pl

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Please be advised that your personal data may be processed for the purposes described below, and the scope of the necessary data that we will obtain is: first name, last name, company name, business address, delivery address, email, username, registration date, tax ID, order information, IP address, device information,

- a) **to conclude and execute a contract**, on the basis of Article 6(1)(b) of the RODO - processing is necessary to take action before concluding the contract and to execute the contract.
- b) **fulfillment of legal obligations incumbent on the administrator in connection with the with the maintenance of accounting and tax records** on the basis of Article 6(1)(c) RODO resulting from the Accounting Act of September 29, 1994, the Corporate Income Tax Act of February 15, 1992,
- c) **debt collection**, on the basis of the administrator's legitimate interest- Article 6(1)(f) RODO, which is to maintain financial liquidity,
- d) **asserting and defending against claims** on the basis of the administrator's legitimate interest- Article 6(1)(f) RODO, which is the defense of interests and taking care of the good name,
- e) **processing and submitting complaints, lodged complaints, requests and other comments regarding cooperation in connection with the performance of the contract** on the basis of the administrator's legitimate interest- Article 6(1)(f) of the RODO, which is to take care of the quality of services provided and fulfillment of the provisions of the contract

THE LENGTH OF TIME FOR WHICH WE WILL PROCESS PERSONAL DATA

Your personal data will be processed for the following period:

- a) Personal data processed for the purpose of entering into and performing the contract, processing complaints or other requests of the contractor, related to the cooperation agreement-until the termination of the cooperation agreement,
- b) personal data resulting from tax records- a maximum of 5 years counting from the end of the calendar year in which the deadline for tax payment expired,
- c) personal data processed for the purpose of claim and defense against claims-until the statute of limitations for claims,
- d) personal data processed for debt collection-until full settlement.

CATEGORIES OF DATA RECIPIENTS

Recipients of data may be entities in the following categories:

- a) entities cooperating with the administrator that provide consulting and legal services,
- b) entities authorized under applicable laws (in particular, courts and state authorities);
- c) entities providing IT and email and website hosting services acting on behalf of the administrator,
- d) entities providing postal and courier services acting on behalf of the administrator,
- e) banks and other financial institutions in connection with the execution of receivables under the contract
- (f) entities providing accounting and bookkeeping services to the administrator,

RIGHTS

As we process your personal data, you have the right to:

- 1) request access to your personal data,
- 2) request rectification of their personal data,
- 3) request deletion or restriction of processing of your personal data,
- 4) portability of personal data (which are processed under contract).

RIGHT OF OBJECTION

In addition, you have the right to object to the processing of your personal data in the cases specified in Article 21 of the RODO.

RIGHT TO COMPLAIN

If you believe that your personal data is being processed in violation of the requirements of the law, you have the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw, <https://www.uodo.gov.pl/>).

INFORMATION ON THE REQUIREMENT OR VOLUNTARINESS OF PROVIDING DATA AND THE CONSEQUENCES OF NOT PROVIDING THEM

With regard to the processing of personal data for the purpose of fulfilling legal obligations incumbent on the controller, the obligation to provide data is a statutory requirement. For other purposes, the provision of personal data is voluntary, but it is necessary for the conclusion and performance of the contract or the proper provision of services.

Clause for Contractor Representatives

Pursuant to Article 13 of the RODO (provided when data is collected from a data subject)

Respecting your privacy and ensuring that you know how your personal data is processed, here is a set of key information related to EU Regulation 2016/679, known as the General Data Protection Regulation ("GDPR"):

PERSONAL DATA CONTROLLER

The administrator of your personal data is Creative Answer Sp. z o.o., NIP: 5252384416, REGON: 140793911, E-mail contact: rodo@creativeanswer.pl

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We inform you that your personal data will be processed for the following purposes:

- a) **to conclude and execute a contract and to establish and maintain relations with the contractor the person represents**, on the basis of the administrator's legitimate interest - Article 6(1)(f) of the RODO, which is to pursue the conclusion and proper execution of the contract
- b) **to fulfill legal obligations incumbent on the administrator in connection with regard to keeping accounting and tax records** on the basis of Article 6(1)(c) RODO resulting from the Accounting Act of September 29, 1994, the Corporate Income Tax Act of February 15, 1992,
- c) **debt collection**, on the basis of the administrator's legitimate interest- Article 6(1)(f) RODO, which is to maintain financial liquidity
- d) **asserting and defending against claims**, on the basis of the administrator's legitimate interest- Article 6(1)(f) RODO, which is the defense of interests and taking care of the good name
- e) **processing and filing of complaints, filed complaints, requests and other comments regarding cooperation in connection with the performance of the contract with the contractor the person represents** on the basis of the legitimate interest of the administrator- Article 6(1)(f) of the RODO, which is to take care of the quality of services provided and fulfillment of the provisions of the contract.

THE LENGTH OF TIME FOR WHICH WE WILL PROCESS PERSONAL DATA

Your personal data will be processed for the following period:

- a) personal data processed for the purpose of concluding and performing the contract, processing complaints or other requests of the contractor, related to the cooperation agreement-until the termination of the cooperation agreement,
- b) personal data resulting from tax documentation- a maximum of 5 years counting from the end of the calendar year in which the deadline for tax payment expired,
- c) personal data processed for the purpose of asserting claims and defending against claims-until the statute of limitations for claims,
- d) personal data processed for the purpose of debt collection-until full settlement

CATEGORIES OF DATA RECIPIENTS

Recipients of data may be entities in the following categories:

- a) entities cooperating with the administrator that provide consulting and legal services,
- b) entities authorized under applicable laws (in particular, courts and state authorities);
- c) entities providing IT and email and website hosting services acting on behalf of the administrator,
- d) entities providing postal and courier services acting on behalf of the administrator,
- e) banks and other financial institutions in connection with the execution of receivables under the contract
- (f) entities providing accounting and bookkeeping services to the administrator,

RIGHTS

As we process your personal data, you have the right to:

- 1) request access to your personal data,
- 2) request rectification of your personal data,
- 3) request the deletion or restriction of the processing of your personal data,

RIGHT OF OBJECTION

In addition, you have the right to object to the processing of your personal data in the cases specified in Article 21 of the RODO.

RIGHT TO COMPLAIN

If you believe that your personal data is being processed in violation of the requirements of the law, you have the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw, <https://www.uodo.gov.pl/>).

INFORMATION ON THE REQUIREMENT OR VOLUNTARINESS OF PROVIDING DATA AND THE CONSEQUENCES OF NOT PROVIDING THEM

With regard to the processing of personal data for the purpose of fulfilling legal obligations incumbent on the controller, the obligation to provide data is a statutory requirement. For other purposes, the provision of personal data is voluntary, but it is necessary for the conclusion and performance of the contract or the proper provision of services.

Clause for persons who are potential contractors/customers or persons acting on behalf of potential contractors/customers

Pursuant to Article 13 of the RODO (provided when data is collected from a data subject)

Respecting your privacy and ensuring that you know how your personal data is processed, here is a set of key information related to EU Regulation 2016/679, known as the General Data Protection Regulation ("GDPR"):

PERSONAL DATA CONTROLLER

The administrator of your personal data is Creative Answer Sp. z o.o., NIP: 5252384416, REGON: 140793911, E-mail contact: rodo@creativeanswer.pl

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We inform you that your personal data will be processed for the following purposes:

- a) establishing relations with a potential contractor or persons acting on behalf of potential contractors, including the submission of offers and requests for proposals, as well as conducting other activities aimed at establishing any business contacts, on the basis of the legitimate interest of the administrator- Article 6(1)(f) RODO, which is to strive to select the most advantageous offer for the supply of services and goods as well as to take care of the Administrator's interests,
- b) asserting and defending against claims, based on the Administrator's legitimate interest- Article 6(1)(f) RODO, which is the defense of the Administrator's interests.

THE LENGTH OF TIME FOR WHICH WE WILL PROCESS PERSONAL DATA

Your personal data will be processed until the contact with the potential contractor is completed and, once the original purpose for which it was collected has been fulfilled, it will be processed for the period of the statute of limitations for claims or until you file an effective objection.

CATEGORIES OF DATA RECIPIENTS

Recipients of the data may be entities in the following categories:

- a) IT service providers (including email hosting providers),
- b) attorneys, legal advisors, and other providers of consulting and legal services cooperating with the administrator;
- c) entities providing postal and courier services acting on behalf of the administrator

RIGHTS

As we process your personal data, you have the right to:

- 1) request access to your personal data,
- 2) request rectification of your personal data,
- 3) request the deletion or restriction of the processing of your personal data,

RIGHT OF OBJECTION

In addition, you have the right to object to the processing of your personal data in the cases specified in Article 21 of the RODO.

RIGHT TO COMPLAIN

If you believe that your personal data is being processed in violation of the requirements of the law, you have the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw, <https://www.uodo.gov.pl/>).

INFORMATION ON THE REQUIREMENT OR VOLUNTARINESS OF PROVIDING DATA AND THE CONSEQUENCES OF NOT PROVIDING THEM

Provision of personal data is voluntary, however, it is necessary for the Administrator to establish relations with a potential contractor, and the consequence of not providing personal data will be the inability to fulfill the above purposes, including the establishment of cooperation.

Clause for correspondents

Pursuant to Article 13 of the RODO (provided when data is collected from a data subject)

Respecting your privacy and ensuring that you know how your personal data is processed, here is a set of key information related to EU Regulation 2016/679, known as the General Data Protection Regulation ("GDPR"):

PERSONAL DATA CONTROLLER

The administrator of your personal data is Creative Answer Sp. z o.o., NIP: 5252384416, REGON: 140793911, E-mail contact: rodo@creativeanswer.pl

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We inform you that your personal data will be processed for the following purposes:

- a) recording outgoing and incoming correspondence and responding to incoming correspondence on the basis of the administrator's legitimate interest - Article 6(1)(f) of the RODO, consisting in the fulfillment of timely responses to letters, timely payments to contractors, caring for the quality of cooperation with contractors and other stakeholders,
- b) asserting and defending against claims, on the basis of the Administrator's legitimate interest - Article 6(1)(f) RODO, which is the defense of the Administrator's interests.

THE LENGTH OF TIME FOR WHICH WE WILL PROCESS PERSONAL DATA

Your personal data will be processed for the following period:

- a) personal data processed to record outgoing and incoming correspondence
- b) and responding to incoming correspondence-until the matter that is the subject of the correspondence is settled or for the period specified in the cooperation agreement
- c) (in the case of correspondence relating to a contract),
- d) personal data processed for the period of claim and defense against claims-until the statute of limitations for claims or until an effective objection is made.

CATEGORIES OF DATA RECIPIENTS

Recipients of data may be entities in the following categories:

- a) a) entities authorized under applicable laws (in particular, courts
- b) and state authorities);
- c) b) entities providing IT services (including email hosting providers), postal and courier services acting on behalf of the administrator,

RIGHTS

As we process your personal data, you have the right to:

- 1) request access to your personal data,
- 2) request rectification of their personal data,
- 3) request deletion or restriction of the processing of their personal data,

RIGHT OF OBJECTION

In addition, you have the right to object to the processing of your personal data in the cases specified in Article 21 of the RODO.

RIGHT TO COMPLAIN

If you believe that your personal data is being processed in violation of the requirements of the law, you have the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw, <https://www.uodo.gov.pl/>).

INFORMATION ON THE REQUIREMENT OR VOLUNTARINESS OF PROVIDING DATA

AND THE CONSEQUENCES OF NOT PROVIDING THEM

Providing personal data is voluntary, however, it is necessary in order to register incoming correspondence and respond. If you do not provide personal data, it will not be possible to handle the matters that are the subject of the correspondence.

Clause for job applicants

Pursuant to Article 13 of the RODO (provided when data is collected from a data subject)

Respecting your privacy and ensuring that you know how your personal data is processed, here is a set of key information related to EU Regulation 2016/679, known as the General Data Protection Regulation ("GDPR"):

PERSONAL DATA CONTROLLER

The administrator of your personal data is Creative Answer Sp. z o.o., NIP: 5252384416, REGON: 140793911, E-mail contact: rodo@creativeanswer.pl

PURPOSES, LEGAL BASIS AND DURATION OF DATA PROCESSING

We inform you that your personal data will be processed for the following purposes:

- a) **Conducting the current recruitment procedure with the selection of an offer on the basis of:**
- Article 6(1)(c) RODO (fulfillment of legal obligations incumbent on the administrator) with regard to data covered by Article 221 § 1 and § 2 of the Labor Code, until the recruitment is completed,
 - Article 6(1)(a) RODO (processing takes place on the basis of expressed consent) with regard to the transfer of other data in the offer by the job candidate, until the withdrawal of consent, however, no longer than until the end of the recruitment procedure. After that time, the controller will delete the data even though the consent has not been withdrawn.
 - Article 9(2)(a) of the RODO* (processing takes place on the basis of explicitly expressed consent in a separate statement) with regard to the transfer of personal data belonging to special categories of data (including, for example, data on health status) as defined in
 - Article 9(1) of the RODO, until the withdrawal of consent however no longer than until the end of the recruitment procedure. After that time, the controller will delete the data even despite the lack of withdrawal of consent.
- b) **To carry out future recruitment** on the basis of Article 6(1)(a) RODO (processing is carried out on the basis of expressed consent), until the withdrawal of consent, however, no longer than 12 months from the moment of granting consent. After this time, the controller will delete your data even though you have not withdrawn your consent.

CATEGORIES OF DATA RECIPIENTS

Recipients of the data may be entities in the following categories:

- a) entities providing IT and email hosting services acting on behalf of the administrator,
- b) entities providing postal and courier services acting on behalf of the administrator.
- c) entities supporting the administrator in recruitment (e.g. recruitment agencies).

RIGHTS

As we process your personal data, you have the right to:

- 1) request access to your personal data,
- 2) request rectification of your personal data,
- 3) To request erasure or restriction of the processing of your personal data,

- 4) to transfer personal data to another controller (data that are processed on the basis of based on consent)
- 5) **withdraw consent** at any time without affecting the lawfulness of processing which was carried out on the basis of consent before its withdrawal. Consent can be withdrawn in person at the Administrator's office, by mail or electronically to the Administrator's e-mail address: rodo@creativeanswer.pl

RIGHT OF OBJECTION

In addition, you have the right to object to the processing of your personal data in the cases specified in Article 21 of the RODO.

RIGHT TO COMPLAIN

If you believe that your personal data is being processed in violation of the requirements of the law, you have the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw, <https://www.uodo.gov.pl/>).

INFORMATION ON THE REQUIREMENT OR VOLUNTARINESS OF PROVIDING DATA AND THE CONSEQUENCES OF NOT PROVIDING THEM

Provision of personal data indicated in Article 221 of the Labor Code is a legal requirement. The provision of your other data on the basis of your consent is voluntary, and failure to provide it will not have negative consequences for the job candidate.

Clause for persons granting Marketing Consents

When subscribing to Our Newsletter, please familiarize yourself with the circumstances of the processing of your personal data.

PERSONAL DATA CONTROLLER

The administrator of your personal data is Creative Answer Sp. z o. o. (34 Altowa St., 02-386 e-mail: office@creativeanswer.pl). In matters related to the protection of your personal data, you can contact by sending an e-mail to: rodo@creativeanswer.pl

PURPOSES AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Your personal data is processed for the purpose of marketing our own products and services on the basis of Article 6(1)(a) of the RODO* (consent of the data subject).

RECIPIENTS OF YOUR PERSONAL DATA

The recipients of your personal data are IT service providers handling the newsletter mailing and IT service providers supporting business management. If you want to know the list of entities to whom we entrust your personal data, please contact us.

THE PROCESSING PERIOD OF YOUR PERSONAL DATA:

Your personal data will be processed until you withdraw your consent to process your personal data.

YOUR RIGHTS UNDER THE GDPR

You have the following rights under the RODO*:

- a) the right to request access to your personal data,
- b) the right to request rectification of your personal data,
- c) the right to request deletion or restriction of the processing of your personal data,
- d) the right to withdraw consent to the processing of your personal data at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal,
- e) the right to data portability to another controller,
- f) the right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

You have the right to withdraw your consent at any time via email address: rodo@creativeanswer.pl, by mail or by visiting us in person at our headquarters.

OBLIGATION TO PROVIDE PERSONAL DATA:

Providing data is voluntary, without providing data and giving consent Creative Answer Sp.z o.o. will not send you commercial information to the indicated e-mail address.

*Reference to: Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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

Clause for Newsletter subscribers

When subscribing to Our Newsletter, please familiarize yourself with the circumstances of the processing of your personal data.

CONTROLLER OF YOUR PERSONAL DATA

The administrator of your personal data is Creative Answer Sp. z o. o. (34 Altowa St., 02-386 e-mail: office@creativeanswer.pl). In matters related to the protection of your personal data, you can contact by sending an e-mail to: rodo@creativeanswer.pl

PURPOSES AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Your personal data is processed for the purpose of marketing our own products and services on the basis of Article 6(1)(a) of the RODO* (consent of the data subject).

RECIPIENTS OF YOUR PERSONAL DATA

The recipients of your personal data are IT service providers handling the newsletter mailing and IT service providers supporting business management. If you want to know the list of entities to whom we entrust your personal data, please contact us.

PERIOD OF PROCESSING OF YOUR PERSONAL DATA

Your personal data will be processed until you withdraw your consent to process your personal data.

YOUR RIGHTS UNDER THE RODO

You have the following rights under the RODO*:

- a) the right to request access to your personal data,
- b) the right to request rectification of your personal data,
- c) the right to request deletion or restriction of the processing of your personal data,
- d) the right to withdraw consent to the processing of your personal data at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal,
- e) the right to data portability to another controller,
- f) the right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

You have the right to withdraw your consent at any time via email address: rodo@creativeanswer.pl , by mail or by visiting us in person at our headquarters.

OBLIGATION TO PROVIDE PERSONAL DATA:

Providing data is voluntary, without providing data and giving consent Creative Answer Sp.z o.o. will not send you commercial information to the indicated e-mail address.

*Reference to: Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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