

Data Processing Clause for participants of training

Who is the Controller of your personal data?

Reynaers Aluminium Ltd
Piaseczno, 12 Okulickiego street

We are part of an international Group Reynaers Aluminium.

Data Protection Officer /DPO/

The Controller has appointed a Data Protection Officer that can be contacted on matters related to personal data processing including the rights of the data subject. DPO can be contacted by sending written correspondence at the address of Reynaers Aluminium or by electronic means at reynaers.pl.iod@reynaers.com.

What is the purpose and legal basis on which we process your personal data?

Your personal data will be processed on the occasion of your participation in the training for the following purposes:

1. When the contract on participation in the training has been concluded:
 - a. With a view to concluding and implementation of the contract, i.e. under Article 6(1)(b) GDPR,
 - b. For compliance with a legal obligation to which the controller is subject, especially related to tax law, i.e. under Article 6(1)(c) GDPR,
2. When the contract on participation has not been concluded, participant's personal data is processed as it is necessary for the purposes of our legitimate interests, which is the proper operation of the service or processing participant's application;
3. Additionally, we process your data to protect our legitimate interests, i.e. under Article 6(1)(f) GDPR, for which we consider:
 - a. establishment, seeking redress arising from the contract or defence against such claims;
 - b. gathering proof confirming the fulfillment of duties imposed by GDPR;
 - c. internal administrative objectives related to reporting, including at the Group level;
 - d. protection of property, people and information – it may happen that your facial image will be recorded by means of CCTV.

Provision of personal data and duration of data retention

In most cases your personal data including your first name, surname, name of employer and contact details has been provided by your employers.

Who are the recipients of your personal data?

If you provide your personal data by yourself, which is treated as collected from the data subject, on the ground appointed in point 1, it is necessary for compliance with a legal obligation. The data is due to be processed during the whole term of the contract.

Providing data referred to in point 2 is voluntary but essential to provide training correctly. The data will be stored up to one year after the end of training.

The data collected for the objective indicated in point 3a will be stored until the final judgement of proceedings, and in case they are not instituted, the data will be stored for a time defined by regulations with regard to claiming / defending damages. In point 3b for a time a natural person or supervisory body is entitled to claim damages on account of failing to comply with particular obligations arising from GDPR. In point 3c for a time not longer than necessary for internal business administrative objectives, not longer than it is allowed by legal regulations. CCTV data is processed up to 3 months maximum. It is possible to store the data after this period only in the cases necessary for the ongoing legal proceedings carried out by authorities or in case if the Controller decides that CCTV data may be subject to such proceedings

The recipients of your personal data may be Partners of Reynaers Aluminium Group as well as other entities which support us in complying with the implementation of aforementioned objectives, including postal operators, couriers, entities providing legal services, providers of IT services necessary for data processing.

Your data may be transferred to public authorities to the extent stipulated by legal regulations.

Information on automated decision making including profiling

Your personal data will not be processed automatically under Article 22 GDPR, including profiling.

Information on transferring data outside EEA

Your personal data will not be transferred outside EEA.

Information on data subject rights

The data subject whose data is processed, depending on the objective and in relation to legal bases, is entitled to the rights referred to Articles 15-22 GDPR including:

- the right to have access to the personal data in the manner and to the extent as stipulated in Article 15 GDPR;
- the right of rectification of the personal data concerning them – in accordance with Article 16 GDPR;

- the right to erasure of personal data – to the extent and in the instances stipulated in Article 17 GDPR;
- the right to restriction of processing – in cases stipulated in Article 18 GDPR;
- The right to object to processing – to the extent stipulated in Article 21 GDPR;
- The right to data portability – with accordance to Article 20 GDPR;
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or affecting it in a similar way – with accordance with Article 22 GDPR;
- the right to withdraw consent at any time according to Article 7(3) GDPR.

The data subject has the right to lodge a complaint related to processing their personal data by the Controller to a supervisory authority. The supervisory authority in Poland is the President of the Personal Data Protection Office. More information on lodging a complaint can be found at the Office website – www.uodo.gov.pl.