GDPR – Personal data protection

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), we inform you about the rules for the processing of personal data by Ultra Metal Powders Sp. z o. o.

Personal data administrator:

Ultra Metal Powders Sp. z o. o.

Ul. Marszałka Józefa Piłsudskiego 74/lokal 320, 50-020 Wrocław

NIP: 8993001841

Information obligation:The rules for the processing of personal data – depending on who you are (e.g. customer, contractor, website user, newsletter subscriber) – are described in detail in this document.

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Contact form

If you want to use or have used our contact form, please read the information on the processing of personal data regarding the handling of inquiries sent to us by e-mail. There you will find details about the purpose, legal basis and storage period of your data.

Social media (Facebook, LinkedIN)

If you have contacted us or interact via social media (e.g. by commenting on posts, sending private messages), please read the information on the processing of personal data regarding our company profiles on these websites.

Customers – contract and order fulfillment

If you have entered into a contract with us or ordered our products or services, please read the information on the processing of personal data regarding the performance of the contract, payments and after-sales service.

Video surveillance

If you want to visit or have visited our headquarters and have been recorded by the video monitoring system, please read the information on the processing of personal data regarding recordings from the CCTV system, used to ensure the safety of people and property.

Suppliers and contractors

If you are our supplier, service provider or other contractor with whom we have concluded a contract or we cooperate, please read the information on the processing of personal data regarding the handling of cooperation, communication and the performance of contractual and legal obligations.

Recruitment

If you want to submit or have submitted application documents in response to a job offer or have sent your CV in order to be included in future recruitments, please read the information on the processing of personal data, which concerns the recruitment process, the rules for processing candidates' data and your rights.

Contact form

Your data administrator:

Ultra Metal Powders Sp. z o. o. in Wrocław, 74 Marszałka Józefa Piłsudskiego Street/premises 320, 50-020 Wrocław, Phone: +48 733 500 574; Email: office@umpowders.com

Personal data is collected and processed on the basis of:

1) Article 6(1)(f) of the GDPR, processing is necessary for the purposes of the legitimate interests pursued by the controller - consisting of correspondence with people interested in the offer and ongoing contact with potential customers
   a) Personal data provided in the contact form (name, e-mail address, phone number) will be processed in order to respond to the inquiry sent.

Storage period:

The data will be stored for the period necessary to handle correspondence, and then for a maximum period of 6 months from the end of contact – in order to secure possible claims.

Customer:

Entities with which the controller has concluded entrustment agreements

Your rights:

1) The right to request access to your data
2) The right to request rectification of data
3) Right to request an erasure
4) Right to request restriction of processing
5) Right to request data portability
6) The right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection with its registered office at 2 Stawki Street, 00-193 Warsaw, Poland

Right to object:

Please be advised that you have the right to object to the processing of your personal data on the basis of Article 6(1)(f) of the GDPR. In the event of an objection, we will not be able to process the data provided for the purposes to which the objection was filed, unless we demonstrate the existence of compelling legitimate grounds for the processing, overriding your interests, rights and freedoms, such as the establishment, exercise or defense against claims.

Obligation to provide data:

Providing personal data is necessary to provide a response.

Social media

Your data administrator:

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Personal data is collected and processed on the basis of:

2) Article 6(1)(f) of the GDPR, processing is necessary for the purposes of the legitimate interests pursued by the controller - running brand profiles in social media and contact with users of these websites.
   a) Personal data provided by Users via social networking sites (e.g. in comments, private messages,

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tags or reactions) are processed for the purpose of:
- conduct ongoing communication with Users,
- handling queries sent via communicators,
- building and maintaining relationships with current and potential customers,
- informing about the company's activities, offers and events,
- respond to the activity of Users (comments, questions, opinions, tags).

Storage period:
The data processed as part of communication in social media will be stored for the period necessary to achieve the purpose of contact or conduct information activities, and then until they are deleted by the User (e.g. deletion of a comment, message) or by the profile administrator, if necessary.

Customer:
In connection with the operation of social media profiles (Facebook, LinkedIn), we would like to inform you that the providers of these services – **Meta Platforms Ireland Limited** and **Microsoft Corporation (LinkedIn), respectively** – are **separate controllers of personal data** in the scope of processing their users' data for their own purposes, including analytical, marketing and statistical purposes. Users' data, such as profile name, comments, reactions, content of private messages or other information disclosed on social media profiles, may be processed by these platforms in accordance with their own terms and privacy policies.

In the scope of administering a company account (LinkedIn), Ultra Metal Powders Sp. z o. o. processes data as an independent administrator only in relation to interactions conducted within these profiles (e.g. responding to messages, comments, handling inquiries). For more information about the processing of data by individual platforms, please refer to their privacy policies:

LinkedIn: https://pl.linkedin.com/legal/privacy-policy

Your rights:
1) The right to request access to your data
2) The right to request rectification of data
3) Right to request an erasure
4) Right to request restriction of processing
5) The right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection with its registered office at 2 Stawki Street, 00-193 Warsaw, Poland

Right to object:
Please be advised that you have the right to object to the processing of your personal data on the basis of Article 6(1)(f) of the GDPR. In the event of an objection, we will not be able to process the data provided for the purposes to which the objection was filed, unless we demonstrate the existence of compelling legitimate grounds for the processing, overriding your interests, rights and freedoms, such as the establishment, exercise or defense against claims.

Obligation to provide data:
The use of social networks (Facebook) and interaction with our profiles (e.g. commenting on posts, sending private messages) is completely voluntary. Providing personal data, such as your profile name, the content of a comment or message, is not mandatory, but it may be necessary to obtain a response or to communicate through the medium in question.

Failure to provide data will make it impossible to respond to an inquiry sent via messenger or participate in a public discussion under our content.

Customers – contract and order fulfillment

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Personal data is collected and processed on the basis of:
1) Article 6(1)(b) of the GDPR, processing is necessary for the performance of a contract to which the data subject is a party
   a) Customers' personal data (e.g. first name, last name, email address, telephone number, delivery address, ID number) are processed for the purpose of:
      - Conclusion and performance of a sales or service contract,
      - handling the order, delivery of goods, assembly, contact regarding implementation,
      - handling complaints and possible warranty service.
2) Article 6(1)(c) of the GDPR compliance with a legal obligation to which the controller is subject

a) Personal data is also processed for the purpose of issuing accounting documents (invoices, bills)

3) Article 6(1)(f) of the GDPR, processing is necessary for the purposes of the legitimate interests pursued by the controller

a) Personal data is also processed for the purpose of after-sales contact, in particular to present additional solutions, products or services, as well as to provide information about new offers, promotions or updates to the offer (direct marketing of own products and services).

Storage period:
Personal data processed in connection with the performance of the contract will be stored:
- for the period necessary to fulfil the contract and for the duration of the **warranty or guarantee**, as well as for the period of limitation of possible claims (in accordance with the provisions of the Civil Code),

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- accounting documents containing personal data (e.g. invoices) will be stored for a period of **6 years**,
- in accordance with the applicable accounting and tax regulations,
- data processed for **after-sales marketing** purposes (e.g. information about additional solutions, services, promotions) will be stored for the duration of the warranty or until the User objects to such processing.

Customer:
Entities with which the administrator has concluded entrustment agreements.

Your rights:
1) The right to request access to your data
2) The right to request rectification of data
3) Right to request an erasure
4) Right to request restriction of processing
5) Right to request data portability
6) The right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection with its registered office at 2 Stawki Street, 00-193 Warsaw, Poland

Right to object:
Please be advised that you have the right to object to the processing of your personal data on the basis of Article 6(1)(f) of the GDPR. In the event of an objection, we will not be able to process the data provided for the purposes to which the objection was filed, unless we demonstrate the existence of compelling legitimate grounds for the processing, overriding your interests, rights and freedoms, such as the establishment, exercise or defense against claims.

Obligation to provide data:
Providing personal data is **a condition for concluding and performing the contract**. Failure to provide the required data (e.g. name, surname, contact details, delivery address, invoice data, identity document number) will prevent the conclusion of the contract, the execution of the order and the issuance of accounting documents.

Providing data for marketing purposes (e.g. after-sales contact with a proposal of new products or services) **is not obligatory**, and their processing may be terminated at any time at the request of the data subject (by lodging an objection).

Video surveillance

Your data administrator:
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Personal data is collected and processed on the basis of:
3) Article 6(1)(f) of the GDPR, processing is necessary for the purposes of the legitimate interests pursued by the controller - consisting in ensuring the safety and protection of the company's property and people on its premises
a) Personal data in the form of an image recorded by the video monitoring system are processed for the purpose of:
- ensuring the safety of people staying on the premises of the company's headquarters
- property protection,
- preventing undesirable situations, including theft, vandalism,
- possible assertion or defense against claims.

Storage period:
Video surveillance recordings are stored for up to 14 days, unless they constitute evidence in the proceedings – then until the final conclusion of the case.

Customer:
Entities with which the controller has concluded entrustment agreements

Your rights:
1) The right to request access to your data
2) The right to request rectification of data
3) Right to request an erasure
4) Right to request restriction of processing
5) Right to request data portability
6) The right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection with its registered office at 2 Stawki Street, 00-193 Warsaw, Poland

Right to object:
Please be advised that you have the right to object to the processing of your personal data on the basis of Article 6(1)(f) of the GDPR. If you object, we will not be able to process your data for the purposes for which you have objected, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, such as the establishment, exercise or defence of legal claims.

Obligation to provide data:
Providing personal data in the form of an image is not obligatory but staying in the area covered by the monitoring results in automatic recording by the camera system. Monitoring works continuously, and data is collected directly by recording devices, without the intervention of the data subject.

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Suppliers and contractors

Your data administrator:

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Personal data is collected and processed on the basis of:

1) Article 6(1)(b) of the GDPR, processing is necessary for the performance of a contract to which the data subject is a party
   a) Personal data of representatives on the side of suppliers, service providers and other contractors are processed for the purpose of concluding and performing civil law contracts (e.g. supply contracts, service contracts)
2) Article 6(1)(c) of the GDPR compliance with a legal obligation to which the controller is subject
   a) Personal data of representatives and contact people on the side of suppliers, service providers and other contractors are processed in order to fulfil accounting and tax obligations (e.g. issuing and storing invoices)
3) Article 6(1)(f) of the GDPR, processing is necessary for the purposes of the legitimate interests pursued by the controller
   a) Personal data of representatives and contact persons on the part of suppliers, service providers and other contractors are processed for the purposes of:
   - pursuing or defending against possible claims,
   - ongoing communication within the framework of cooperation.

Storage period:

Personal data processed in connection with the conclusion and performance of contracts with suppliers, service providers and other contractors will be stored by:

- the duration of cooperation and the performance of the contract,
- and then for the period necessary to secure any claims – in accordance with the limitation periods resulting from the provisions of civil law,
- Accounting documentation (e.g. invoices) containing personal data will be stored for **6 years**, in accordance with accounting and tax regulations.

Customer:

Entities with which the controller has concluded entrustment agreements

Your rights:

1) The right to request access to your data
2) The right to request rectification of data
3) Right to request erasure
4) Right to request restriction of processing
5) Right to request data portability
6) The right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection with its registered office at 2 Stawki Street, 00-193 Warsaw, Poland

Right to object:

Please be advised that you have the right to object to the processing of your personal data on the basis of Article 6(1)(f) of the GDPR. If you object, we will not be able to process your data for the purposes for which you have objected, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, such as the establishment, exercise or defence of legal claims.

Obligation to provide data:

In the case of natural persons who are a party to the contract (e.g. sole proprietorships, contractors of civil law contracts), the provision of personal data is necessary to conclude and perform the contract. Failure to provide data will prevent the establishment of cooperation.

In the case of representatives or contact persons acting on behalf of the contractor (e.g. employees or associates of the supplier), providing data may be necessary for the proper implementation of cooperation and maintaining ongoing working contact.

Data source – contact persons on the supplier's side

The data of contact persons on the side of suppliers, contractors or other contractors may be obtained:

- directly from those persons,
- or provided by the employer/company they represent – as a contact person or contract performance person.

Recruitment

Your data administrator:

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Personal data of job candidates are processed on the basis of:

1) Article 6(1)(c) of the GDPR compliance with a legal obligation to which the controller is subject a) conducting the recruitment process for the position for which the application was submitted,
   - In connection with Article 221 of the Labour Code
   b) assessment of the candidate's qualifications, experience and predispositions for employment.
2) Article 6(1)(b) of the GDPR, processing is necessary for the performance of a contract to which the

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data subject is a party
a) take steps to conclude a contract (if the candidate is selected)
3) Article 6(1)(a) of the GDPR consent to the processing of data
a) archiving recruitment documents (in the case of consent to participate in future recruitments).
In order for us to store your application documents for future recruitment processes, please attach the following consent to your application:
"I agree to the use of my application documents in future recruitment processes conducted by Ultra Metal Powders Sp. z o. o.

Storage period:
Personal data of candidates will be stored:
- for the duration of the current recruitment process and up to **3 months** after its completion – in order to document the recruitment process and possible contact with the candidate.
- in the case of consent to participate in future recruitments – for a period of **up to 12 months** from the date of receipt of consent or until its early withdrawal.

After the expiry of the indicated periods, the data will be permanently deleted or anonymized, unless there are other grounds for their further processing (e.g. the completed personal questionnaire is placed in the employee's personal file).

Customer:
Entities with which the controller has concluded entrustment agreements

Your rights:
1) The right to request access to your data
2) The right to request rectification of data
3) Right to request an erasure
4) Right to request restriction of processing
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6) The right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection with its registered office at 2 Stawki Street, 00-193 Warsaw, Poland

Information on the possibility of withdrawing consent
Consent to the processing of personal data for the purpose of participation in future recruitment processes may be withdrawn at any time – without affecting the lawfulness of the processing that was carried out before its withdrawal.

To withdraw consent, it is sufficient to send an e-mail to the following address: bok@elitegarden.pl with information about the withdrawal of consent for further storage of application documents for recruitment purposes. Upon receipt of such a request, the data will be deleted immediately.

Obligation to provide data:
Providing personal data to the extent specified in **Article 22[1] § 1 of the Labour Code** (m.in. name, surname, contact details, education, professional qualifications, employment history) is **mandatory** and necessary to take part in the recruitment process.

Providing data beyond this scope (e.g. photo, interests, references, consent to participate in future recruitments) is **voluntary**, and their processing takes place only on the basis of the candidate's consent. Failure to provide mandatory data may prevent the application from being included in the recruitment process

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