

Privacy Policy

We respect your privacy, so we would like to inform you how we process your personal data by providing a Privacy Policy on our website. We have divided the privacy policy into several sections. Depending on whether you are a newsletter subscriber, a job applicant or simply visiting our website, different sections of the Privacy Policy apply to you. In each chapter, we describe in detail which of your personal data we hold and how we use it. We have also added information about your rights, such as how you can access your data and request that we stop using it.

General information

Who is the controller of your personal data?

The administrator of your personal data is LED-POL sp. z o.o., sp. k. with its registered office in Bielsko-Biała, 40 Kustronia Street, 43-300 Bielsko-Biała.

For what purpose can we process your personal data?

We may process your personal data for various purposes, depending on how you interact with us.

- If you are our customer or you have approached us to buy a product offered by us, we process your personal data in order to establish and perform a contract between us, as well as to comply with legal obligations, e.g. tax obligations. We may also process your data in order to assert possible contractual claims.
- If you are a subscriber to our newsletter, we process your personal data with your consent in order to send you the newsletter on a regular basis.
- If you are a potential customer of ours who has provided us with your contact details in order to receive information about our products by means other than a newsletter, we process your personal data with your consent in order to keep you informed about our products.
- If you are a person representing our contractor or a contact person who assists the parties to a contract in its performance we process your data for the purpose of performing that contract.
- If you are a candidate for employment with our company, we process your personal data in order to employ you.
- If you are our employee, we process your personal data in order to perform the employment contract between us and to comply with our legal obligations as an employer.
- If you have simply entered our website because you are interested in our company, we process some of your computer data through cookies in order to facilitate your use of our website.

What rights do you have?

Right of access to your data:

At any time you have the right to request information about which of your personal data we process. To do so, please contact LED-POL.

Right to request data portability:

When LED-POL processes your personal data, you have the right to receive a copy of your data in a structured, commonly used and readable format. This copy can be sent to you or to another entity.

Right to rectification of data:

You have the right to request the correction of your personal data if it is incorrect, and to complete incomplete data.

Right to erasure of data:

You have the right to request the erasure of any data processed by LED-POL at any time, except in the following situations:

- you have unfinished business with the Customer Service Department
- you have an open order which has not yet been dispatched or has only been partially dispatched
- you have an outstanding debt to LED-POL, regardless of the payment method
- If you have made any purchases, we will retain your personal data relating to the transaction for accounting purposes for as long as necessary, in accordance with the applicable legislation.

The right to object to the processing of your data on the basis of LED-POL's legitimate interest: You have the right to object to the processing of your data on the basis of LED-POL's legitimate interest due to your particular situation. We will stop processing your personal data unless we can demonstrate that our legitimate interest overrides your right to privacy, e.g. in connection with the need for us to pursue legal claims.

Right to withdraw your consent to the processing of your personal data: You can withdraw your consent for us to process your personal data at any time if the legal basis for the processing is precisely your consent. Please note that withdrawing your consent does not affect the lawfulness of the processing that we carried out on the basis of your consent prior to its withdrawal.

Right to restrict processing:

You have the right to request that LED-POL restricts the processing of your personal data under the following conditions:

- if you do not consent to the processing of your data on the basis of LED-POL's legitimate interest, in which case LED-POL will restrict any processing of such data after verifying that such legitimate interest exists.
- if you report that your personal data is inaccurate, then LED-POL must restrict any processing of such data until the accuracy of such data has been verified.
- if the processing is unlawful, then you may not agree to the erasure of your personal data and instead request a restriction on the use of your personal data.
- if LED-POL no longer needs your personal data, but it is required for the establishment, investigation or dismissal of a claim.

How can you exercise your rights?

Please direct any questions, requests and demands to us by email at daneosobowe@led-pol.pl or send us a letter by post to LED-POL sp. z o.o., sp. k., 40 Kustronia St., 43-300 Bielsko-Biała.

The right to lodge a complaint with the supervisory authority:

If you believe that LED -POL processes your personal data in an inappropriate manner, you can contact us. You also have the right to report a complaint to the President of the Office for Personal Data Protection.

Updating the Privacy Policy:

It may become necessary to update the Privacy Policy in the future. Its latest version will always be available on our website. We will keep you informed of any changes in the best way to reach you.

Specific information

1) Customers

We would like to inform you that the administrator of your personal data is LED-POL sp. z o.o. sp. k. based in Bielsko-Biała, ul. Kustronia 40 (“Administrator”). Furthermore, we inform that:

1. your personal data will be processed by the Administrator in order to conclude and perform the contract, as well as to take actions at your request before concluding the contract. The legal basis is Article 6(1)(b) RODO. In connection with the conclusion of the contract, the Administrator processes your personal data in order to comply with its legal obligations, for example tax obligations. The legal basis for the processing is Article 6(1)(c) RODO. The Administrator may also process your personal data for the purpose of asserting or defending claims and direct marketing which is the Administrator’s legitimate interest. The legal basis for the processing is Article 6(1)(f) RODO

2. your personal data will be processed for the period necessary for the conclusion and performance of a contract binding you to the Data Controller. Your personal data will be also be processed by the Administrator after the expiry of the contract until the expiry of the period of limitation of claims arising from that contract, and possibly longer if such an obligation results from legal regulations, e.g. tax regulations.

For the purposes specified above, the Administrator may make your personal data available to other entities. Recipients of your personal data may be internal authorities and entities that need to process your personal data in connection with the processing and performance of the contract and our legitimate interest, as well as external service providers such as accountants, auditors, lawyers, IT service providers, banks, insurance providers, postal and courier service providers. Recipients of the data are located in countries within the European Economic Area (EEA).

4 The controller may use profiling to best tailor its advertising to your needs. We will use mailing tools and then track users’ email opening history to send them information that is most useful to them. The profiling we use is not purely automated and will not have any legal effect on you or similarly significantly affect you. You may request the cessation of profiling at any time.

5 The provision of personal data is voluntary but necessary for the conclusion and execution of the contract. If you do not provide personal data, the contract cannot be concluded.

6 You have the right to access your personal data, the right to request rectification, erasure, restriction of processing and portability in the cases and under the conditions described in the RODO. You can exercise the aforementioned rights by sending a request to the Administrator.

(7) At any time, you have the right to object to the processing of your personal data based on a legitimate interest pursued by the Controller as referred to in Article 6(1)(f) of the RODO on grounds related to your particular situation. You may exercise the aforementioned right by submitting an appropriate request.

(8) You have the right to lodge a complaint with the President of the Data Protection Authority for the purpose of data protection if you believe that the Controller is processing your personal data in

an unlawful manner. For any data protection issues, please contact the Administrator at the e-mail address daneosobowe@led-pol.pl or in writing to the Administrator's registered office address.

2) Newsletter subscribers

Led-Pol sp. z o.o. sp.k. wishing to provide its customers with the best possible access to all information on its activities, promotions and events in which it participates, offers its customers the possibility of receiving current information through the "Newsletter" service.

We would like to inform you that the administrator of your personal data is LED-POL sp. z o.o. sp. k. with its seat in Bielsko-Biała, 40 Kustronia Street ("Administrator"). Furthermore, we inform that

1. personal data is processed by the Administrator only for the purpose of realization of the service Newsletter i.e. for the purpose of direct marketing of products offered by LED-POL. For this purpose, LED-POL obtains the names of e-mail addresses from interested persons.
2. The legal basis for such processing is the subscriber's consent – Article 6(1)(a) RODO.
3. The above personal data will be processed until you withdraw your consent to the processing of personal data.
4. For the purposes specified above, the Administrator may share your personal data with other entities. Recipients of your personal data may be internal bodies and entities that need to process your personal data in relation to the fulfilment of our legitimate interest and external service providers that process personal data on behalf of or commissioned by the Administrator such as IT service providers, marketing and advertising service providers, postal and courier service providers.
5. Recipients of data are located in countries within the European Economic Area (EEA).
6. The controller does not use automated decision-making, including profiling.
7. The provision of personal data is voluntary but necessary to send you information about the Administrator's offers and promotions.
8. In the cases and on the terms described in the RODO, you have the right to access your personal data, the right to request rectification, erasure, restriction of processing and portability. You can exercise the aforementioned rights by submitting an appropriate request.
9. You have the right to withdraw your consent to the processing of your personal data at any time, whereby the withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.
10. You have the right to lodge a complaint with the President of the Data Protection Authority for data protection purposes if you believe that the Administrator is processing your personal data in an unlawful manner.
11. In any matters related to data protection, please contact the Administrator at the following e-mail address daneosobowe@led-pol.pl or in writing to the Administrator's registered office address.

3) 3) Potential customers who have provided us with their contact details to receive information about our products by means other than a newsletter. We would like to inform you that the administrator of your personal data is LED-POL sp. z o.o., sp. k. with its registered office in Bielsko-Biała, 40 Kustronia Street, 43-300 Bielsko-Biała ("Administrator").

Furthermore, we inform that

1. the Administrator processes your personal data in order to:
 - Marketing of goods and services offered by the Administrator. The legal basis for such processing is your consent – Article 6(1)(a) RODO.
 - ensuring that the advertisements provided to you about the products we offer (profiling) are tailored to your needs. The legal basis for the processing is the legitimate interest of the Administrator – Article 6(1)(f) RODO.
2. The above personal data will be processed until you withdraw your consent. Personal data shall not be kept longer than necessary to fulfil the intended purpose or longer than required by applicable law.
3. For the purposes set out above, the Administrator may share your personal data with other entities. Recipients of your personal data may be internal bodies and entities that need to process your personal data in connection with the preparation and performance of a contract and in connection with the fulfilment of our legitimate interest, as well as external service providers processing personal data on behalf of the Administrator such as accountants, auditors, lawyers, IT service providers, banks, entities conducting insurance activities, entities providing marketing and advertising services, entities providing postal and courier services.
Recipients of the data are located in countries within the European Economic Area (EEA).
4. The controller may use profiling to best tailor its advertising to your needs. We will use mailing tools and then track users' email opening history to send them information that is most useful to them. The profiling we use is not purely automated and will not have any legal effect on you or similarly significantly affect you. You may request the cessation of profiling at any time.
5. The provision of personal data is voluntary but necessary for the Administrator to send you marketing information.
6. You have the right to access your personal data, the right to request rectification, erasure, restriction of processing and portability in the cases and under the conditions described in the RODO. For reasons related to your particular situation, you may also object to profiling. You may exercise the aforementioned rights by submitting an appropriate request.
7. You have the right to withdraw your consent at any time, whereby the withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.
You have the right to lodge a complaint with the President of the Data Protection Authority for the purpose of data protection if you believe that the Administrator is processing your personal data in an unlawful manner.

In any matters related to data protection, please contact the Administrator at the e-mail address daneosobowe@led-pol.pl or in writing to the Administrator's registered office address.

4) Persons representing our contractor

We would like to inform you that the administrator of your personal data is LED-POL sp. z o.o., sp. k. based in Bielsko-Biała, 40 Kustronia Street, 43-300 Bielsko-Biała ("Administrator").

Furthermore, we inform that

1. Your personal data will be processed by the Administrator in order to conclude and perform the Agreement between the Administrator and the entity you represent, which constitutes a legitimate interest of the Administrator in accordance with Article 6(1)(f) RODO.

2. The Administrator will process the following categories of your personal data: name and surname and position, address, e-mail, fixed and mobile telephone number, while no processing of special categories of personal data referred to in Article 9 of the RODO is planned.

3. The above personal data will be processed for the period necessary for the conclusion of the contract binding the Administrator with the entity you represent and, after the expiry of the contract, for the duration of the contractual obligations arising therefrom and thereafter until the expiry of the limitation period for claims relating to the subject matter of the contract or until the expiry of the periods resulting from accounting regulations, whichever is longer.

4. If the data are not collected directly from you, their source is the other party to the contract concluded with the Administrator.

5. For the purposes specified above, the Administrator may share your personal data with other entities. Recipients of your personal data may be internal bodies and entities that need to process your personal data in connection with the processing and performance of the contract and our legitimate interest and external service providers such as accountants, auditors, lawyers, IT service providers, banks, insurance providers, postal and courier service providers. Recipients of the data are located in countries within the European Economic Area (EEA).

6. The controller does not use automated decision-making, including profiling.

7. The provision of personal data is voluntary but necessary for the conclusion and performance of the contract between the Administrator and the entity you represent.

8. In the cases and under the conditions described in the RODO, you have the right to access your personal data, the right to request rectification, erasure, restriction of processing and portability. You can exercise the aforementioned rights by submitting an appropriate request. The request form is available on the Administrator's website.

9. You have the right at any time to object to the processing of your personal data based on a legitimate interest pursued by the Controller as referred to in Article 6(1)(f) of the RODO on grounds related to your particular situation. You may exercise the aforementioned right by submitting an appropriate request.

10. You have the right to lodge a complaint with the President of the Data Protection Authority for the purpose of data protection in case you believe that the Controller is processing your personal data in an unlawful manner.

In any matters related to data protection, please contact the Administrator at the e-mail address daneosobowe@led-pol.pl or in writing to the Administrator's registered office address.

4) Job applicants

We would like to inform you that the administrator of your personal data is LED-POL sp. z o.o., sp. k. with its registered office in Bielsko-Biała, 40 Kustronia Street, 43-300 Bielsko-Biała ("Administrator").

Furthermore, we inform that:

1. the Company processes personal data of candidates:

I. to the extent required by the provisions of the labour law in order to employ the candidate in the Company and to take actions prior to concluding the employment contract. The legal basis for the

processing is Article 6(1)(b) and (c) of the DPA.

II. personal data of candidates beyond the scope of the data listed in the legislation provided by the candidate, the Company processes for the purpose of assessing the candidate and entering into an employment contract with the candidate based on the candidate's consent. The legal basis for the processing is Article 6(1)(a) RODO.

2. The above employee's personal data will be collected, processed and used for the time necessary to carry out the recruitment process for a specific position and to take steps to establish an employment relationship. At the end of the recruitment process, the personal data of a candidate who is not employed by the Company will be deleted. If the candidate gives his/her consent for his/her personal data to be processed also in future recruitments conducted by the Company, the data are kept for a maximum period of 1 year from the end of the first recruitment.

3. For the purposes specified in paragraph 1, the Company may share employees' personal data with other entities. Recipients of employees' personal data may be entities processing candidates' personal data on behalf of the Company such as employment agencies, IT service providers, security providers, monitoring providers and postal and courier service providers. Recipients of the data are located in countries within the European Economic Area (EEA) and there is no sharing of data outside this area.

4. You have the right of access to your personal data, the right to request rectification, erasure, restriction of processing and data portability.

The aforementioned rights can be exercised by submitting an appropriate request.

5. With regard to personal data processed on the basis of the candidate's consent, the candidate shall have the right to withdraw consent at any time, whereby withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

6. The candidate acknowledges that providing the personal data referred to in para. 1

1) above is an obligation under the applicable legislation and is a condition for the conclusion and performance of the employment contract. Failure to provide the aforementioned personal data may result in the candidate's inability to be employed by the Company. The provision of personal data processed on the basis of the candidate's consent is voluntary, and the refusal to provide consent or its withdrawal does not cause any negative consequences for the candidate.

7. The candidate has the right to lodge a complaint with the President of the Data Protection Authority for the purpose of data protection if the Employee believes that the Company is processing his/her personal data in an unlawful manner.

8. The Company does not use automated decision-making, including profiling.

Please contact the Administrator by email at daneosobowe@led-pol.pl or in writing to the Administrator's registered office address for any data protection issues.

5) 5) Employees

We would like to inform you that the controller of your personal data is LED-POL sp. z o.o., sp. k. with its registered office in Bielsko-Biała, 40 Kustronia Street, 43-300 Bielsko-Biała ("Administrator").

Furthermore, we inform that

1. 1. the Employer processes employees' personal data:

a) in order to comply with its legal obligations under the provisions of law relating to the employment of employees and for the purpose of executing employment contracts. The legal basis for the processing is Article 6(1)(b) and (c) of the RODO and Article 9(2)(b), (c) and (h) of the RODO as well as the relevant generally applicable legal acts, in particular the Labour Code Act of 26 June 1974 (Dz.U. 1974 no. 24 item 141, consolidated text Dz.U. of 2018 item 108 as amended), the Act of 4 March 1994 on the Company Social Benefits Fund (Dz.U. 1994 No. 43 item 163, consolidated text Dz.U. of 2017, item 2191 as amended), Act of 13 October 1998 on the social insurance system (Dz.U. 1998 No. 137 item 887, consolidated text Dz.U. of 2017, item 1778 as amended), Act of 17 December 1998 on pensions from the Social Insurance Fund (Dz.U. 1998 No. 162 item 1118, consolidated text Dz.U. of 2017 item 1383 as amended).

b) in order to pursue its legitimate interests such as:

– ensuring the safety of employees, protection of property, production control and maintaining the secrecy of information the disclosure of which could expose the Employer to damage – with regard to the image of employees captured in CCTV recordings. The legal basis for the processing is Article 6(1)(f) RODO.

– to ensure that the location of the vehicle can be determined in the event of theft, to ensure that work is organised to allow employees to fully utilise their working time and to ensure the proper use of the cars provided to the employee in terms of GPS monitoring. The legal basis for the processing is Article 6(1)(b) and (f) of the RODO in conjunction with Article 223 § 4 of the Labour Code and also Article 6(1)(a) of the RODO in the event that employees use company cars for private purposes.

– sharing with contractors, suppliers and business partners for the purposes of negotiating with, entering into and performing contracts with contractors, for attending conferences and undertaking other activities with business partners and suppliers. The legal basis for the processing is Article 6(1)(f) RODO.

– To promote the products or services offered and to carry out marketing of its activities in terms of photos of employees disclosed on the Employer's website, including Facebook. The legal basis for the processing is Article 6(1)(a) RODO.

2. Personal data shall not be kept longer than necessary to fulfill the intended purpose or longer than required by applicable laws. Personal data of employees will be collected, processed and used during the employment relationship and some of them also after its termination. In particular, personnel records are kept for 50 years from the date of termination of employment for the employer, payroll records are kept for 50 years from the date of generation. CCTV recordings are processed for a maximum period of 3 months, unless the contents of the recordings constitute evidence in legal proceedings, in which case they can be processed for a maximum period of 10 years from the final conclusion of the proceedings. Personal data of employees disclosed to contractors, suppliers and business partners for the purpose of entering into or executing a contract are processed for a period prior to the conclusion of the contract and for a period of 5 years for contracts with businesses and 10 years for contracts with consumers from the due date of the claim.

Photos of employees posted on the Internet are processed until the employee withdraws consent, maximum for a period of 10 years from the date of access.

3. For the purposes specified in paragraph 1, the Employer may share employees' personal data with other entities. Recipients of employees' personal data may be entities that process employees'

personal data on behalf of and on behalf of the Employer, such as entities engaged in HR and payroll activities, entities engaged in accounting activities, entities engaged in training activities, entities engaged in health and safety services, entities engaged in IT services, entities engaged in security activities, entities operating in the field of monitoring, including GPS, entities operating in the field of health care, banks, airlines and other entities providing transport-related services, entities operating in the field of insurance, entities providing recreational and sports services to employees, entities providing postal and courier services.

Recipients of employees' personal data may also be other entities to which personal data is made available for the purpose of entering into a contract or taking action prior to entering into a contract, such as business partners, vendors and suppliers for the purpose of executing a contract. The data may also be shared with state authorities to the extent permitted by law.

Recipients of the data are located in countries within the European Economic Area (EEA) and in some cases may be outside the EEA. When personal data is shared outside the EEA, the Employer guarantees an adequate level of data protection in accordance with applicable data protection laws. In case the data sharing takes place to a country outside the EEA for which the European Commission has not issued a decision on an adequate level of protection, the Employer shall apply the protective measures provided for in the RODO, in particular, it shall apply the EU standard contractual clauses. In this case, the employee has the right to obtain a copy of the personal data provided from the Administrator.

4. The employee has certain rights with respect to his/her personal data, such as the right to access personal data, the right to request rectification, erasure, restriction of processing and data portability.

In the case of processing of personal data based on the Employer's legitimate interest referred to in Article 6(1)(f) of the RODO, the Employee has the right to object due to his/her particular situation.

The above-mentioned rights may be exercised by submitting an appropriate request to the Administrator.

5. With regard to personal data processed on the basis of the employee's consent, the employee has the right to withdraw consent at any time, with the withdrawal of consent not affecting the legality of the processing performed on the basis of consent before its withdrawal.

6. The employee acknowledges that the provision of personal data that the employer processes in the performance of a legal obligation is an obligation under the law and is a condition for the conclusion and performance of the employment contract. The processing of

personal data that the employer processes in order to fulfill its legitimate interest placed on employees by the employer. Failure to provide the aforementioned personal data may result in the inability of the employee to be employed by the Employer and to perform the employment contract. Provision of personal data processed on the basis of the employee's consent, is voluntary, and the refusal to provide consent or its withdrawal does not cause any negative consequences on the part of the employee.

7. An employee has the right to file a complaint with the President of the Office of Personal Data Protection for data protection purposes in the event that the Employee believes that the Employer is processing his personal data in violation of the law.

8. The Employer does not use automated decision-making, including profiling.

9. In any matters related to data protection, please contact the Administrator by email at daneosobowe@led-pol.pl or in writing to the Administrator's registered address.

7. Cookie policy

The websites partially use so-called cookies. Cookies do not harm your computer and do not contain viruses. Cookies are used to make our offer more user-friendly, more effective and safer. Cookies are small text files that are stored on your computer and stored in your browser.

Most of the cookies we use are so-called "session cookies." They are automatically deleted when your visit ends. Other cookies remain stored on your device until you delete them. These cookies allow us to recognize your browser the next time you visit.

You can set your browser so that you are informed of the cookie settings and allow cookies only on a case-by-case basis, accepting cookies in some cases or in general excludes and activates the automatic deletion of cookies when you close your browser. Disabling cookies may limit the functionality of this site.