1. Identity of the Data Controller

The controller of the User's personal data is **Veolia Construction Poland Sp. z o. o.** with its registered office in Poznań (61-017), ul. Energetyczna 7a (hereinafter referred to as "VCON").

2. Purpose of the Website Personal Data Processing Notice and Target Users

The purpose of this Website Personal Data Processing Notice is to inform visitors and users (hereinafter **"User/Users"**) of the Veolia Construction Poland Sp. z o. o. website: **energia-instalacje.pl** (hereinafter the **"Website"**) about the methods used to protect their personal data, in accordance with:

- 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 (General Data Protection Regulation – **GDPR**),
- The Polish Act of 10 May 2018 on Personal Data Protection (Dz. U. 2018, item 1000),

(hereinafter collectively referred to as the **"Regulations"**).

Veolia Construction Poland Sp. z o. o. may update this Website Personal Data Processing Notice at any time, in particular to comply with any editorial or technical changes required by law.

3. Description of the Processing Operation

In connection with the use of the Website, Veolia Construction Poland Sp. z o. o. may process personal data to provide Users with access to the functionalities and services it offers (hereinafter **"Services"**), such as completing a contact form related to our services.

1) What categories of data are processed?

Data collected directly from you:

- Contact details: mandatory data provided by Users when completing contact forms, i.e., Company name, First and last name, Phone number, Email address.

- **Analytical data (if consent has been granted):** information about the User's manner of using the Website, traffic sources, time spent on the page, browser type, anonymised IP address – collected via cookies

Data collected indirectly from you:

- **Data obtained from third parties:** e.g., if you are a representative of a legal entity, we may check public information in the business register to obtain further information regarding your authorization or power of attorney, or to verify the data you submitted

to us.

- **Inferred data:** we may check our internal database to determine if there are connections to your complaint and group the information to provide you with a response.

Please note: We do not verify or combine information provided via social media platforms (e.g., Facebook, Instagram) to formulate a response to you.

All such data is hereinafter collectively referred to as **"Data"**.

In addition to the Data mentioned above, we also process data collected via cookies. To learn more about these categories of data, purposes, and retention conditions, we recommend reviewing our Cookie Notice.

2) Why does Veolia Construction Poland Sp. z o. o. collect User Data?

Data is collected for the following purpose:

- Handling User inquiries submitted via contact forms or sent directly to the email addresses provided on the Website.

Mandatory fields in the contact form(s) are marked with an asterisk. While providing personal data in the contact form is voluntary, failure to provide contact details for the communication channel chosen by the User will result in Veolia Construction Poland Sp. z o. o. being unable to respond to your inquiry.

3) What is the legal basis for processing User Data?

Processing of data is lawful only if performed under one of the legal bases specified in the Regulations. The legal basis for processing data in connection with the use of the Website is **Article 6(1)(f) of the GDPR** – your personal data will be processed:

- for the purpose of responding to a request/question asked and/or handling the reported matter based on the legitimate interest of the controller;
- for marketing purposes in connection with the marketing consent obtained from the User for the selected communication channel (email, SMS/MMS, phone calls);
- for analytical and statistical purposes (website traffic research) – on the basis of the User's consent expressed through the cookie banner.
- for the purpose of establishing, pursuing, or defending claims by Veolia Construction Poland Sp. z o. o.

4) Recipients of Collected Data

Data collected via the contact form is intended for internal organizational units of Veolia Construction Poland Sp. z o. o. and will be processed by authorized employees and associates of the Controller.

Furthermore, recipients of User personal data may include entities cooperating with the Controller, in particular IT system and service providers, technical and organizational service

vendors, as well as agencies providing market research, marketing services, and advertising campaigns.

Internal recipients may also include Veolia Group subsidiaries located within or outside the European Union (EU), provided that any transfer of Data outside the EU takes place in accordance with the terms set out in point 7) *"Transfer of Data Outside the European Union"*. Each receiving subsidiary may act as a processor or a separate controller of the transferred Data.

Data transferred to authorities and/or public bodies

In accordance with applicable Regulations, Data may be disclosed to competent public authorities upon request—specifically public authorities solely to fulfill legal obligations—law enforcement officials, ministerial officers, and debt collection organizations, as well as in connection with the prosecution of offenses committed via the network.

4. Exercise of Users' Rights

Users have the right to access their data, as well as the right to rectification, erasure, restriction of processing, data portability, the right to object, and the right to withdraw given consent at any time.

Users may exercise their rights by:

- Sending an email to: **inspektor.pl.vpol@veolia.com**
- Sending a written request to the Controller's address: **Veolia Construction Poland Sp. z o. o., ul. Energetyczna 7a, Poznań, Poland**

Users also have the right to lodge a complaint with the supervisory authority (in Poland: the **President of the Personal Data Protection Office - PUODO**) if they consider that the processing of their personal data violates the provisions of the GDPR.

5. Data Retention and Archiving Period

User Data will not be stored longer than strictly required for the purposes set out in this document, in accordance with the Regulations.

User personal data will be stored:

- In the case of processing based on marketing consent – until receipt of notice regarding consent withdrawal. Giving consent is voluntary and can be withdrawn at any time without affecting the lawfulness of processing based on consent prior to its withdrawal;
- For the period necessary to protect the Controller's interests (legitimate interest of the controller);
- Where data has been collected for the purpose of responding to User inquiries, for a period of **6 months** from receipt of the inquiry;

- In the case of processing based on the consent granted for analytical cookies, the data will be processed until the User withdraws their consent or the analytical cookies expire (for a maximum of 13 months).

Veolia Construction Poland Sp. z o. o. may retain Data indefinitely in an anonymized form for statistical research. Under no circumstances will such research allow Users to be identified, as it will pertain solely to trends derived from aggregated User Data.

6. Security

Veolia Construction Poland Sp. z o. o. takes appropriate technical and organizational measures to ensure Data security and to prevent unauthorized access to or disclosure of User Data. However, Veolia Construction Poland Sp. z o. o. cannot guarantee that all risk of intrusion, falsification, unlawful replication, or misuse of Data has been entirely eliminated.

Veolia Construction Poland Sp. z o. o. undertakes to take all necessary precautions as well as appropriate organizational and technical measures to ensure the security, integrity, and confidentiality of Data, and in particular to prevent its alteration, damage, or access by unauthorized third parties.

7. Transfer of Data Outside the European Union

User personal data may be transferred to third countries (outside the European Economic Area) to a Veolia Group subsidiary or a third party, in particular in connection with the use of global IT solutions by Veolia Construction Poland Sp. z o. o.

Data will be transferred to third countries for which the European Commission has issued an adequacy decision. In the case of third countries for which no such decision has been issued, data transfers will always be carried out using one of the safeguards aimed at ensuring an adequate level of data protection referred to in Chapter V of the GDPR. Information regarding the safeguards mentioned in the preceding sentence can be obtained by contacting the Data Protection Officer via email at: **inspektor.pl.vpol@veolia.com**