

## Privacy Policy.

The Privacy Policy aims to transparently present methods we employ for collecting, utilizing, and sharing personal data provided by you while using Our Service, and constitutes compliance with the requirements of 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 (hereinafter referred to as GDPR) within the scope of Articles 13 and 14.

## **General Provisions**

- 1. This privacy policy applies to the website www operating at the address: <u>https://gdanskshipyard.pl/</u> (hereinafter referred to as the "Service").
- 2. The Operators of the Service and Co-Administrators of personal data processed on the Service are:
  - Baltic Operator sp. z o.o. with its registered office at ulica Na Ostrowiu 15/20, 80-873 Gdańsk a company belonging to the Baltic Industrial Group, registered in the National Court Register Register of Entrepreneurs kept by the District Court Gdańsk Północ, VII Commercial Department of the National Court Register, under the number KRS 735044, Tax Identification Number (NIP) 957-11-06-653; REGON 38048139600000, share capital 70,105,000.00 PLN.
  - Grupa Przemysłowa Baltic sp. z o.o., with its registered office at ulica Na Ostrowiu 15/20 , 80-873 Gdańsk – as the holding company of the Baltic Industrial Group,

hereinafter collectively referred to as the "Administrators," "Co-Administrators," "We," or "GPB."

- 3. In matters related to data processing, the administrators have designated a common contact point: tel. +48 58 769 16 00, e-mail: gpb@gpbaltic.pl, as well as a Data Protection Officer Paweł Modrzejewski, and his deputy Izabela Walczak, whom you can contact at the email address: iod@gpbaltic.pl for all matters related to the processing of personal data and the exercise of rights related to data processing.
- 4. While using the Service <u>https://gdanskshipyard.pl/</u>, Users may provide Administrators with personal data enabling their identification (e.g., name, email address, and phone number). Providing such data is required when submitting a contact form. Users may also apply for a selected position using the Service. To do so, they should complete the appropriate application form and provide the required data (name, surname, contact details, selected position, CV). Providing data necessary for recruitment is mandatory, as it is conducted based on legal provisions. Otherwise, it is voluntary.
- 5. The website uses Cookies, which also collect specific data about the User to ensure the smooth functioning of the site, as well as for marketing and statistical purposes. More information on this subject can be found in the "Cookies" section.



Basis and Purposes of Personal Data Processing, and Security Measures

6. The Administrators will process personal data to respond to inquiries sent via email or contact form, as well as for purposes detailed in the "Cookies" section.

The legal basis for processing personal data in these cases is:

- User consent, expressed for example by accepting the use of cookies or providing additional contact information (Art. 6(1)(a) of the GDPR).
- The necessity of processing data to take action at the request of the User before entering into a contract (Art. 6(1)(b) of the GDPR), including in relation to recruitment conducted through our Service (application form);
- Legitimate interest pursued by GPB, which is to respond to inquiries or direct marketing (Art. 6(1)(f) of the GDPR).

Providing contact details in the submitted email or completed form is voluntary, but failure to do so will prevent us from responding to the User's inquiry.

To review the information clause for our Clients and Contractors, please click on the following link (GPB\_011-Z03\_2.1.).

- 7. The Administrators exercise special care to protect the interests of the individuals whose data is concerned, ensuring that the collected data is:
- 1) Processed lawfully, fairly, and in a transparent manner to the data subject;
- 2) Collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes;
- 3) Adequate, relevant, and limited to what is necessary for the purposes for which they are processed;
- 4) Accurate and, where necessary, kept up to date;
- 5) Retained in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- 6) Processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

Rights, Data Recipients, Processing Period, and Data Transfer to Third Countries

8. In accordance with the provisions of the GDPR, individuals whose personal data is processed by GPB have the following rights:

a) The right to access their personal data and obtain confirmation from the Administrator as to whether personal data concerning them is being processed, and, if so, access to such data and information as specified in Article 15 of the GDPR;

b) In cases where data processing is based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

c) The right to request rectification of their inaccurate personal data or completion of incomplete personal data;

d) The right to request erasure of their personal data in cases specified in Article 17 of the GDPR;

e) The right to request restriction of processing of their personal data in cases specified in Article 18 of the GDPR, including challenging the accuracy of personal data;



f) The right to object to the processing of personal data, including profiling, for direct marketing purposes, where the processing is based on the legitimate interests pursued by the Administrator.

g) The right to lodge a complaint with the supervisory authority responsible for personal data protection – the President of the Personal Data Protection Office – if it is believed that the processing of personal data violates the provisions regarding their protection.

9. Personal data may be transferred to:

a) Entities processing personal data on behalf of GPB, including IT service providers, marketing service providers, and other processing entities – whereby such entities process data based on a contract and solely in accordance with the Administrator's instructions;

b) Entities authorized under applicable law (e.g., authorities),

c) In justified circumstances, entities financially linked to the administrators (entities within the GPB group).

- 10. Your personal data will be stored for the period necessary to achieve the purposes indicated in point 5 or until you withdraw your consent if it is the basis for processing the data.
- 11. As a rule, we do not transfer data to third countries. However, please note that we have a profile on the social media platform LinkedIn, and the website <a href="https://gdanskshipyard.pl/">https://gdanskshipyard.pl/</a> contains a plugin to this platform. By clicking on it, the User is redirected to the appropriate LinkedIn platform, which may involve the transfer of their data to the platform administrator. This data is processed in third countries, including the USA, in accordance with the privacy policies of LinkedIn. More information on this topic, as well as a link to the privacy policy on LinkedIn, can be found in the "Social Media Profiles" section.

## Cookies

12. On the website <a href="https://gdanskshipyard.pl/">https://gdanskshipyard.pl/</a>, the Administrators use cookies, which allow to customize the content on the website to the User's needs, improve the functioning of the website, and analyze traffic on the site. Cookies are computer data, text files that are stored on the User's end device and are intended for using websites. Cookies contain, among other things, such data as: the name of the website they come from, the time they are stored on the User's end device, and an unique number generated to identify the User's web browser to connect to the website. Cookies often store information that is necessary for the proper functioning of the website. Cookies may also store a unique device identifier.

13. Cookies used on the website <u>https://gdanskshipyard.pl/</u> are used for the following purposes:

a) Collecting anonymous statistics, allowing the Administrator to better understand user expectations and develop the website to be even more user-friendly,

b) Ensuring the proper functioning of selected website functions,

c) Optimizing the website (i.e., adapting its appearance to the most popular devices),

- d) Advertising purposes,
- e) Ensuring even server load,

f) Handling user sessions,

g) Preventing multiple presentation of the same message informing about the use of cookies by the website.



14. If the User does not consent to the use of cookies by the Administrators or wishes to limit the scope of cookie usage, they may choose to refrain from using the website, change their web browser settings, or use a tool to change cookie settings on the website.

15. The User can change their web browser settings regarding cookies at any time, especially to block automatic handling of cookies (in whole or in part).

16. Please note that limiting or disabling the use of cookies may affect some functionalities of the website <a href="https://gdanskshipyard.pl/">https://gdanskshipyard.pl/</a>.

17. Detailed information on changing settings related to cookies and their self-deletion in the most popular web browsers is available in the browser's help section and on the following pages (just click on the link):

- Chrome browser
- Firefox browser
- Internet Explorer browser
- Opera browser
- -<u>Safari browser</u>
- -Microsoft Edge browser

18. Each User has the opportunity to delete their data from our Analytics database at any time using the plugin: <u>https://tools.google.com/dlpage/gaoptout</u>. Each User also has the opportunity to change settings in their Google account at any time to limit the ads they see <u>https://myaccount.google.com/privacy#ads</u> in the Ad Settings section.

## Social Media Profiles

19. As part of our marketing activities, we maintain a profile on the LinkedIn social media platform. Baltic Operator sp. z o.o. with its registered office at ulica Na Ostrowiu 15/20 in Gdańsk is responsible for its management under the terms specified below. A plugin to our profile is placed on the website <a href="https://gdanskshipyard.pl/">https://gdanskshipyard.pl/</a>. Please note that by clicking on it, the User will be redirected to the LinkedIn portal, which processes data as a separate administrator according to the policy regarding the processing and protection of personal data. The LinkedIn service is provided by LinkedIn Corporation, headquartered at 1000 W Maude, Sunnyvale, CA 94085, US, and belongs to the Microsoft group. Information about the processing of personal data by the service is available at the LinkedIn Privacy Policy.

20. Please note that by clicking on the LinkedIn plugin, the User's data in the form of an IP address and browser identifier may be transferred to the owner of this portal.

21. Please be aware that Baltic Operator sp. z o.o. with its registered office at ulica Na Ostrowiu 15/20 in Gdańsk is not responsible for the processing of personal data by the administrator of the LinkedIn portal, including in particular for personal data posted on User profiles.

22. We are only the administrator of those personal data of LinkedIn Users that are collected in connection with the management of the profile, for example, as part of communication with Users and are processed solely for the purpose of providing a response if necessary. The User's activity related to using our profile will not be archived outside the LinkedIn service unless it is necessary for evidentiary purposes. The processing of personal data on our profile is based on the following legal bases:

- Art. 6(1)(a) of the GDPR, based on consent, which the User expresses by directing a query to us on the profile,



- Art. 6(1)(b) of the GDPR, in connection with interest in our products and services - the desire to enter into an agreement with us.

- Art. 6(1)(f) of the GDPR, based on our legitimate interest, which may include sending the User a message about a service or promotion in which the User is or may be interested, or for the purpose of pursuing claims.

23. Information about Users that we have in messages will be stored for the period necessary to respond to inquiries or until the termination of cooperation, if it occurs, taking into account cases concerning the pursuit of potential claims. In the case of information we have in User-provided comments, they will be available on our website until they are deleted by the author or administrator. Personal data collected by LinkedIn, such as post history, app activity history, is subject to retention according to LinkedIn's policies. Under the provisions of the GDPR, each User of the Baltic Operator profile has the following rights regarding personal data:

The right to access their data content,

The right to obtain a copy of their data (if such possibility exists),

The right to rectification,

The right to erasure,

The right to restriction of processing,

The right to object to processing,

The right to data portability (if there is an appropriate legal basis and possibility),

The right to lodge a complaint with the President of the Office for Personal Data Protection in the event of our violation of personal data protection regulations.

The right to withdraw consent to processing, if it was the basis for processing, whereby withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.

For any requests regarding data processing, please contact the address provided in point 3.

24. Initiating any relationships between the administrator of the profile (Baltic Operator) and a User of the social media platform is entirely voluntary.

**Baltic Operator sp. z o.o.** with its registered office at ulica Na Ostrowiu 15/20 in Gdańsk, and Grupa Przemysłowa Baltic sp. z o.o., with its registered office at ulica Na Ostrowiu 15/20, 80-873 Gdańsk, as co-administrators of your personal data, make every effort to ensure that the physical, technical, and organizational measures employed provide protection of personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, in accordance with all applicable regulations. The core part of agreements regarding co-administration of data is available upon request. To obtain it, please contact the Data Protection Officer: iod@gpbaltic.pl