



Information duty for the personnel and representatives of contractors

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**) has been in force in the European Union since May 25, 2018.

The implementation of GDPR is an opportunity to inform you how we protect and process your personal data and what rights you have in this regard.

The changes introduced as part of GDPR do not require you to contact Orange. Please read the information below.

How do we process your personal data?

Your personal data have been indicated by Orange Polska's contractor, e.g. entity which provide services to Orange Polska S.A. We therefore process your personal data such as first name, last name, e-mail address or telephone number.

Orange Polska S.A. is the controller of your personal data – which means that we are responsible for using data in a secure manner, in accordance with our agreement (if any) and in accordance with applicable law.

1. For what purpose and on what basis do we use personal data?

- a. concluding and performing an agreement between us and the contractor for the purpose of service installation and failure removal,
We process those data for the duration of the agreement or for 6 years after termination of an Agreement or for 6 years after their acquisition if an agreement has not been concluded (in order to pursue claims resulting from negotiations concerning conclusion of agreement or defend against them) (legal basis: Article 6(1)(f) of GDPR; we will further refer to that basis as "*our legitimate interest*")
- b. pursuing claims.
We process those data for 6 years after termination of an agreement or for 6 years after their acquisition if an agreement has not been concluded (in order to pursue claims resulting from negotiations concerning conclusion of agreement or defend against them) (legal basis "*our legitimate interest*")
- c. contact in order to prepare summaries or analyses or statistics for our internal needs, e.g. for the needs of reporting, marketing studies, planning of service or network expansion, IT systems development work, creating of statistical models,
We process those data for the duration of the agreement or for 6 years after termination of an agreement or 90 days from date for lack of offer acceptance in order to analyze reasons of lack of concluding agreement) (legal basis "*our legitimate interest*")

2. Which data must be provided to us by our partner?

OPL does not envisage the obligation of providing contact data.

OPL processes such data as: first name, last name, e-mail address or telephone number, so that we can fulfill the goals of processing.

Providing data to Orange Polska when concluding a wholesale agreement is not a statutory requirement.

3. To whom may the personal data be transferred?

- a) entities processing data on our behalf, participating in performing our activities:
 - a. supporting our ICT systems or making ICT tools available to us,
 - b. subcontractors supporting us for example when providing telecommunications services, assembling equipment or handling correspondence,
 - c. entities supporting and maintaining our telecommunications network.
- b) other controllers processing your data on their own behalf:
 - a. entities providing postal or courier services in relation to handling your queries and requests,
 - b. other telecommunications carriers with which Orange Polska has signed wholesale agreements, in the scope in which it results from performing regulatory obligations imposed by President's of the Office of Electronic Communications administrative decisions.

4. Will the data be processed outside the European Economic Area?

We do not plan to transfer your data outside the European Economic Area (which includes the European Union, Norway, Liechtenstein and Iceland), or to international organizations.

5. Automated decision making

We do not use your data to make automated decisions which could significantly affect you.

6. Your rights

You may file a request with us for:

- rectification (correcting incorrect data),
- erasure (erasure of data processed without basis),
- restriction of processing (suspending data operations until completing the processing of the request for objection or rectification or non-erasure of your data which we no longer need),
- access to data (for information about data processed by us and a copy of the data),
- data portability to another controller or to you, if we process data which have been provided to Orange directly by you.

You may exercise these rights by submitting a request in writing to:

Orange Polska S.A.
ul. Jagiellońska 34,
96-100 Skierniewice

To make sure that we process your request addressed to us, we may ask you to provide additional information enabling us to authenticate the applicant.

The scope of any of these rights, and situations in which you may exercise them, result from GDPR. Full GDPR text is available at eur-lex.europa.eu and <http://www.hurt-orange.pl/rodo/>.

7. Right to object

In particular situations, you may at any time object to processing your personal data (including profiling) by us based on our legitimate interest or based on public interest.

In such case, after considering your request, we will no longer be able to process your personal data covered by the objection, unless we prove that there are:

- important legitimate grounds for data processing which override your interests, rights and freedoms, or
- grounds for establishment, exercise or defence of legal claims.

8. Consent

If our use of your data is not necessary for the conclusion or performance of a contract, performance of a legal obligation or does not constitute our legitimate interest, we may ask you for consent to certain manners of using your data. Such consent may concern e.g. automated decision making based on your data, on your demand. Consent may be withdrawn at any time (this will not affect the lawfulness of data use before its withdrawal).

9. Complaint

You may lodge a complaint with the President of the Office of Personal Data Protection if you consider that the processing of personal data infringes legal provisions.

Our contact details:

Our registered office address is:

Orange Polska S.A.
Al. Jerozolimskie 160,
02-326 Warszawa

Our address for correspondence (for all requests submitted in order to exercise your rights):

Orange Polska S.A.
ul. Jagiellońska 34,
96-100 Skierniewice

Contact details of Orange Polska S.A.'s Data Protection Officer: inspektorochronydanych@orange.com

More information

To learn more about how we use and protect your data, or about your rights, please visit the website: www.hurt-orange.pl/rodo.