1. The administrator of your personal data is Air BP Aramco Poland Sp. z o. o. with its registered main office at al. Grunwaldzka 472B, 80-309 Gdańsk. The Administrator can be contacted via e-mail: <a href="mailto:sekretariat@airbparamco.com">sekretariat@airbparamco.com</a> or in writing, at the above address.

The personal data administrator has designated a Data Protection Representative, who can be contacted via e-mail: <u>sekretariat@airbparamco.com</u> or in writing, at the address: Air BP Aramco Poland Sp. z o. o. al. Grunwaldzka 472B, 80-309 Gdańsk with a note "Personal Data Protection Representative".

The Data Protection Representative can be contacted in all matters related to personal data processing and the use of rights related to data processing.

- 2. The Administrator collects and processes personal data in relation to its business activity, according to the legal regulations on personal data protection, in particular to the stipulations of the Regulation of the European Parliament and of the Council (UE) 2016/679 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 hereinafter GDPR) and rules provided therein.
- 3. The Administrator ensures the transparency of personal data processing, informs about data processing, in particular about the purpose and the legal basis for personal data processing, unless he or she is not obliged to do so according to separate legal regulations and makes sure that the data is collected only within the scope required for the designated purpose and processed only for the required period of time.
- 4. The Administrator also ensures data security and confidentiality, as well as access to the information on data processing to the Entities.
- 5. In regards to data integrity and confidentiality, the Administrator has implemented procedures enabling access to personal data only to authorised persons and only within the scope required for the tasks such persons perform. The Administrator uses organisational and technical measures to ensure that all operations on personal data is recorded and made only by the authorised persons.

The Administrator undertakes all the required actions to ensure that its sub-contractors and other entities collaborating with the Administrator guarantee the application of the respective safeguards in any and all cases, when they process personal data on the order of the Administrator.

The Administrator carries out continuous risk assessment for personal data protection and monitors the adequacy of the applied personal data safeguards to the identified threats. If necessary, the Administrator applies additional measures intended to improve the security.

- 6. Legal basis and purposes of the processing of your personal data:
- a) Direction to the Administrator via electronic mail or traditional post, unrelated to the agreement concluded with the sender or to the provided services, personal data in such correspondence is processed only for the purpose of communication and solving the issue the correspondence pertains to.

The legally justified interest of the Administrator (Art. 6(1f) of GDPR) is the legal basis for personal data processing, including correspondence directed to the Administrator, related to its business activity.

The Administrator processes only personal data relevant to the case the correspondence pertains to. The entire correspondence is stored such that it ensures security of the personal data (and of other information) included in it and disclosed only to the authorised persons.

- b) Contacting the Administrator by telephone in matters unrelated to the concluded agreement or provided services may generate requests of the Administrator to provide personal data only if this is required for processing of the case the contact is related to. In this case, the legally justified interest of the Administrator (Art. 6(1f) of GDPR) is the legal basis, including the need to solve the reported case related to its business activity.
- c) The Administrator provides the option of contacting it using electronic contact forms provided on the websites of the Administrator. If such a contact form is used, it is necessary to provide personal data required to initiate the contract and provide a reply to the enquiry. The provision of personal data is required within a scope required to accept and process the enquiry, as well as to send a reply to an enquiry.

Personal data is processed in order to identify the sender and to process their enquiry sent via the provided form. In the case of enquires regarding the agreement concluded with the sender or the provided services, the execution of an agreement concluded with the sender of the enquiry (Art. 6(1b) of GDPR) is the legal basis for data processing.

In the case of enquiries unrelated to the agreement concluded with the sender or with the provided services, the legally justified interest of the Administrator (Art. 6(1f) of GDPR), involving an answer to the enquiry, is the legal basis for the processing. The Administrator processes only personal data required to provide a reply.

- d) If the Administrator collects data for purposes related to the conclusion or execution of the specific agreement, the Administrator shall provide the affected person with detailed information regarding the processing of their personal data upon agreement conclusion or when it acquires the personal data, if the processing is required for the Administrator to undertake actions on request of the data Entity, before the conclusion of an agreement. The extent of the disclosed data is always limited to the scope required for the aforementioned purposes. In this case, the legal basis is the need to execute the agreement, the affected party is a party to, to which the data is related or to undertake actions on request of the agreement is concluded (Art. 6(1b) of GDPR).
- e) If personal data is obtained during agreement conclusion during the business activity, the Administrator shall obtain from the partners/customers data of members of the bodies, proxies or representatives, persons involved in execution of such agreements (e.g. contact persons, persons executing orders, etc.). The scope of disclosed data is always limited to the extent required in order to confirm the representation authorisations held and to execute the agreement. Personal data obtained during the aforementioned process is processed for the purpose of execution of legally justified interest of the Administrator and of its partner (Art. 6(1f) of GDPR), involving the enabling of correct and effective execution of the agreement. The data is processed over a period required to execute the aforementioned interests and to meet the legal obligations.
- f) As a part of recruitment processes, the Administrator processes personal data for job candidates (e.g. provided in the CV/resume), only within the scope provided for in the Labour Law Code. If the position the candidate applies for requires a criminal background check certificate to be presented, it shall be presented according to the effective, related legal regulations (Art. 6(1c) of GDPR). If the sent applications contain data exceeding the scope provided for in legal regulations, its processing shall be based on the consent of the

candidate (Art. 6(1a) of GDPR, and in the case of provided data included in a special category of personal data, Art. 9(1a) of GDPR) expressed as a clear confirming action, which is ticking the relevant checkbox. If the sent applications contain information inadequate for the purpose of recruitment, it shall not be used or taken into account during the recruitment and shall be immediately deleted.

Personal data is processed in order to meet the obligations dictated by legal regulations related to the employment process, in particular those dictated by the Labour Law Code – the legal basis for processing is the legal obligation of the Administrator (Art. 6(1c) of GDPR in relation to labour law regulations). In the case of employment based on a civil law contract – for the purpose of the recruitment process – the legal basis for data processing is undertaking actions before signing the contract, on request of the affected person (Art. 6(1b) of GDPR). If data not required by the law or by the Administrator is obtained during the recruitment process, the legal basis is the consent of the applicant (Art. 6(1a) of GDPR or Art. 9(1a) of GDPR). In the case of verification of qualifications and skills of the candidate and agreeing upon the employment condition – the legal basis includes the legally justified interest of the Administrator (Art. 6(1f) of GDPR). The legally justified interest of the Administrator to identify or raise any claims or to defend against claims raised against the Administrator – the legally justified interest of the Administrator to identify or raise any claims or to defend against claims raised against the Administrator – the legally justified interest of the Administrator is for data processing.

If tests and/or questionnaires are used during the recruitment process, the Administrator shall implement them with the approval of the candidate (Art. 6(1a) of GDPR). The candidate may refuse to participate in filling the test and/or questionnaire, wherein this shall not impact the recruitment process.

Within the scope, in which personal data is processed according to a provided consent, said consent may be revoked at any time, with the exception that it shall not influence the legal conformity of data processing which had taken place before the consent was revoked. If the consent was given for the purpose of future recruitment processes, the personal data shall be deleted not later than after 12 months – unless the consent was revoked earlier.

 In relation to business activity requiring personal data processing, personal data may be disclosed to third parties including, in particular, providers responsible for the operation of ICT systems and equipment, entities providing accounting services, postal operators and couriers.

The Administrator reserves the right to disclose the selected information related to the data Entity to the relevant authorities or third parties which submit a request to provide such information, based on the appropriate legal basis and according to the effective legal regulations.

- 8. The Administrator may transfer personal data outside the European Economic Area ("EEA"). If a personal data transfer outside the EEA is required, it shall take place only with the appropriate protection degree ensured, mainly through:
- a) Cooperation with entities processing personal data in countries, for which the European Commission has issued a decision concluding that the appropriate level of personal data protection has been ensured
- b) The use of standard contractual clauses issued by the European Commission
- c) The use of binding corporate rules approved by the relevant supervisory body

The Administrator shall inform the data Entity about its intention to transfer personal data outside the EEA during the data collection stage.

- 9. The period of data processing by the Administrator depends on the type of the provided service and the processing purpose. It may also be dictated by regulations, if they provide the basis for the processing. If data is processed on the basis of the justified interest of the Administrator e.g. for safety reasons the data shall be processed for a period of time enabling the execution of said interest or to raise and effective objection against data processing. If the processing is based on a consent, the data shall be processed until the consent is revoked. If the processing is based on the need to conclude and execute an agreement, the data is processed until agreement termination. The data processing period may be extended if processing is required to determine or raise claims or to defend against claims, and after said period only in the case and within the scope provided for by the law. At the end of the processing period the data is irrevocably deleted or anonymised.
- 10. The data Entities shall have the following rights
- a) The right to information regarding personal data processing on this basis, the Administrator shall provide the requesting individual with information about personal data processing, including, first and foremost, the purposes and legal basis for the processing, the extent of data held, entities to which the data is disclosed and the planned data deletion date
- b) The right to obtain a copy of the data the Administrator shall provide a copy of the processed personal data related to the requesting individual
- c) The right to amend the Administrator shall be obliged to remove any incorrect data or errors in the processed personal data and supplement incomplete data
- d) The right to delete the data this is the basis for a request to delete data, the processing of which is no longer required for the execution of any of the objectives, for which the data has been collected
- e) The right to limit the processing if such a request is made, the Administrator shall cease the operations on personal data, excluding operations for which you have consented and data storage, according to the accepted data retention rules or until the reasons for limited processing expire (e.g. a decision permitting further data processing is issued by a supervisory body)
- f) The right to transfer data on this basis within the scope in which the data are processed in an automated manner in relation to a concluded agreement or granted consent – the Administrator shall release the data provided by the affected person, in a format enabling the data to be read by a computer. It is also possible to request such data to be sent to a different entity, however, under the condition that this is technically feasible both for the Administrator and the designated entity.
- g) The right to object against data processing the data Entity can object at any time because of reasons related to its special situation – against the data processing which takes place on the basis of a legally justified interest of the Administrator (e.g. for marketing, analytical or statistical purposes), the relevant objection should include a justification
- h) The right to revoke the consent if personal data is processed on the basis of an expressed consent, the data Entity has the right to revoke the consent at any time, which, however, does not influence the legality of processing which had taken place before the consent was revoked
- i) The right to complain if it is found that personal data processing violates the GDPR regulations or other regulations related to personal data processing, you shall have the right

to raise a complain to the body supervising personal data processing. In Poland, the President of the Personal Data Protection Agency is the supervisory body.

11. A request related to the execution of your rights can be made in writing, at the correspondence address of the Administrator indicated in p. 1.

If the Administrator cannot identify an individual on the basis of the submitted request, it shall ask the requesting person for additional information. The provision of such data is not mandatory, however, the request shall not be processed if said data is not provided.

The request may be made in person or via a proxy (e.g. a family member). Because of personal data security, the Administrator encourages to use the power of attorney in a form certified by a public notary, an authorised legal adviser or a lawyer, which significantly accelerates the authenticity verification of the request.

A reply to the request shall be sent within 30 days from the request receipt. If it is necessary to extend this deadline, the Administrator shall notify the requesting person about the reason behind such an extension and about the period, in which the request shall be processed.

The Administrator shall reply to the request in the same form in which the request had been sent to the Administrator, unless the requesting person has requested a reply in a different form. If the request processing deadline prevents the Administrator from sending a written reply and the scope of personal data of the requesting person processed by the Administrator enables electronic contact, the Administrator shall send the reply electronically.

The Administrator shall store the information related to the submitted request and the requesting person in order to be able to prove the conformity and to identify, defend or raise any claims related to the data entities.