

# PRIVACY POLICY

## OF HUTA ŁAZISKA SA WITH ITS REGISTERED OFFICE IN ŁAZISKA GÓRNE

Protection of personal data of our Users is our greatest concern, therefore we put every effort so that everyone who entrusts their personal data to us feels secure while using the website of Huta Łaziska SA at: <https://hlsili.pl>. This Privacy Policy specifies how we collect and process your personal data while you visit our website, which refers to this Privacy Notice. It is also possible the information is entrusted to our Trusted Partners (hereinafter the "Trusted Partners"), i.e. third parties who cooperate with us in terms of our Services and with whom we have concluded relevant agreements. We cooperate with them so that we provide Services of the highest quality.

### 1. DEFINITIONS

- 1) **Controller** - Huta Łaziska S.A. with its registered office in Łaziska Górne at Cieszyńska 23, 43-170 Łaziska Górne (hereinafter the "Company").
- 2) **Personal data** - any information of an identified or identifiable natural person by reference to one or more factors specific to her physical, physiological, genetic, mental, economic, cultural or social identity, including device ID, location data, on-line identifier, and information gathered by cookies and other technology.
- 3) **Policy** – this Privacy Policy applicable to the Company's website.
- 4) **GDPR** - Regulation (EU) 2016/679 of the European Parliament and 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/WE;
- 5) **Polish Law on Telecommunications** - Act of 16 July 2004 - Law on Telecommunications (Journal of Laws No. 2022, item 1648 as amended).
- 6) **LPOES** - Act of 18 July 2002 - Law on Provision of Electronic Services (Journal of Laws 2020, item 344 as amended).
- 7) **Website**– the Internet website of Huta Łaziska S.A., referring to this Privacy Note, maintained by the Controller and shared at the Company's domain: <https://hlsili.pl>.
- 8) **User** – each natural person visiting the Website or using a functionality offered within the Website.
- 9) **Services** – actions related to software, hardware, system, also with data processing.
- 10) **Trusted Partners** – services and tools of other entities for the purpose of providing our services, improving and analysing them. The Trusted Partners pursue objectives we have set.

### 2. PERSONAL DATA CONTROLLER

1. The personal data Controller is Huta Łaziska S.A. with its registered office in Łaziska Górne at ul. Cieszyńska 23, 43 -170 Łaziska Górne.
2. In matters related to protection of personal data, the User may contact the Data Protection Officer via email: [iod@hlsili.pl](mailto:iod@hlsili.pl) or in writing to the registered office address of the Controller.

**3. COLLECTION OF PERSONAL DATA**

1. We collect personal data for the purpose of provision of services and for constant development of our products and services.
2. We collect the following kinds of personal data:
  - 1) we store all information provided by you while using the Company’s Website. You may refuse to provide certain information, however, in such a case you may not have the access to our Website.
  - 2) while you use the Website, including this obtained from content and services provided via the Website. As many other websites, we use cookies and other unique identifiers, and we gather certain kinds of information when your browser or device uses the access to the Website and other content offered by or on behalf of the Company at other websites.
3. Your personal data collected in the Internet, such as: IP addresses, identifiers of your terminal equipment and identifiers of cookies, your browsing history, may be processed by the Company and the Trusted Partners in order to: store information or gain access to information stored in the equipment, select general advertising or select personalised advertising, create a profile of personalised advertising, create a profile of personalised content, measure performance of advertising, measure performance of content, apply market research to generate recipients opinion, develop and enhance products, provide security, prevent fraud and remove errors, technical supply advertising or content.
4. What is more, we process your data for the purpose of providing save and tailored services, personalising the content, making the social media function available and analysing the Internet traffic: adjusting and combining of off-line data sources, connecting various equipment, using precise geolocation data, receiving and using the automatically sent characteristics of an identification device.

**4. LEGAL BASIS FOR DATA PROCESSING**

<b>Purposes of data processing:</b>	<b>Legal basis:</b>	<b>Processing period:</b>
performance of a contract, provision of the Services for the Users, adjusting Services to the Users’ needs to the extent necessary to provide the Services to the Users, maintaining and technical	article 6(1)(b) of the GDPR - necessary for the performance of a contract to which the User is party or in order to take steps at the request of the data subject prior to entering into a contract.	until the expiry of a given contract concluded between you and the Company, provided that sometimes the data may be

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support for the Services necessary for providing the Services to the Users, analysing and improving the Services necessary to provide the Services to the Users and ensuring security of the Services, preventing frauds and removing errors necessary to provide the Services to the Users (hereinafter the "**Provision of the Services**").

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processed even after the expiry, however, only when it is admissible or required by applicable law.

tailoring the Services to the Users' needs, creation of a profile of personalised content and Services, selection of personalised content and Services (hereinafter the "**optimisation**"); technical supply of content, Services or advertising, maintaining and technical support for the Services, measurement of performance of content, Services or advertising (hereinafter the "**technical performance of the Services**"); statistical measurements, analysing and improvement of the Services (the "**statistics**"); ensuring security of the Services, preventing frauds and removing errors (the "**security**"); marketing (including analysing and profiling of data for marketing purposes) of products and services of the controller (hereinafter the "**own marketing**").

article 6(1)(f) of the GDPR - the legitimate interests pursued by the controller, where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

until the objection to the processing is effectively raised, however not longer than 3 years.

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formulating and giving responses to queries or other

depending on the purpose for which the query or request has been sent, it is going to be

until the response to the query or request addressed

requests addressed to the Company.	taking measures aiming at conclusion of a contract (article 6(1)(b) of the GDPR) or a legal obligation (article 6(1)(c) of the GDPR in conjunction with articles 15–22 of the GDPR) or the legitimate interest pursued by the controller (article 6(1)(f) of the GDPR) consisting of a possibility to respond to the query or request.	to the Company is formulated and given, however in case of requests pertaining to exercising of rights vested in data subjects – 5 years of performance or giving the response to the request, unless the applicable law states otherwise.
establishment, exercise or defence of legal claims.	article 6(1)(f) of the GDPR – legitimate interest of the controller in establishment, exercise or defence of legal claims.	until the prescription of claims, however not longer than 6 years of the end of a calendar year where the event that may be the grounds for a claim happened.
handling requests and proceedings that may pertain to Users' data, carried out by authorised bodies e.g. courts, prosecution, law enforcement, governmental agencies.	article 6(1)(c) of the GDPR – in conjunction with provisions authorising a relevant body to make a request – legal obligation.	until the request is executed.

## 5. DOES THE COMPANY DISCLOSE YOUR PERSONAL DATA?

1. Our business activity does not include making such information available to third parties in return for monetary consideration. The Company discloses personal data of the Users to third parties only if this required by the applicable law.
2. Services provided by third parties: we commission certain functions on our behalf to other companies or individuals. The services include, e.g. meeting orders for services, deliveries of packages, handling of mail and e-mail, removal of repetitive data from lists of clients, data analysis, marketing support, providing of browsing results and links to websites (including payable ones), providing content. The above third parties have access to personal data necessary to perform the entrusted duties, however, they cannot use them

for any other purpose. Those parties are also obliged to process personal data in the manner compliant with this Privacy Policy and in accordance with the law applicable in terms of the personal data protection.

3. We disclose data regarding the Users and other personal data each time we consider it appropriate in order to meet legal requirements, execute or apply contractual provisions or in order to protect rights, ownership or safety. It applies also to exchange of information with other entities and organisations in order to prevent fraud and limit risk.
4. In cases other than described above, in a situation when information about you may be disclosed to third parties, you will be notified. In such a case, you can refuse to consent for the disclosure of your information.
5. In case the Company discloses personal data to countries outside the European Economic Area (EEA) we make sure that such a disclosure is carried out in the manner compliant with this Privacy Policy and in accordance with the law applicable in terms of the personal data protection. We base on decisions of the European Commission in terms of adequacy or we conclude agreements including standard protective provisions published by the European Commission.

## **6. TRUSTED PARTNERS**

1. Entities providing analytical services - Google Analytics, Google Search Console; Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043.
2. Interactive agencies specialising in on-line marketing.
3. Technological companies working on maintaining and developing the Company's Website.
4. Software providers.
5. Operators of platforms for gathering and managing your data that may be used by the Company, Sponsors, Partners, and by advertisers cooperating with those platforms.

## **7. SECURITY OF INFORMATION ABOUT YOU**

1. Designing our system and devices, we take into consideration the security of your data transfer, thanks to the use of encryption protocols and software.
2. We employ measures of physical and electronic protection, and security procedures for gathering, storing, and sharing personal data of the Users. The implemented security procedures mean that before we disclose personal data to you, we may verify your identity.
3. Protection of your password and your computers, devices and applications against unauthorised access should be of a great importance for you. We recommend that you use a unique password at the Company's website, the one you do not use for any other internet account. Having finished using a shared computer, you should always log out.
4. The Controller carries out the risk analysis on an ongoing basis in order to ensure that personal data are processed by them in a safe manner - the one ensuring that, first of all, the access to the data is given only to individuals authorised by the Controller and only for the purpose and in the scope that is necessary due to the tasks they perform. The Controller is committed to care that all the operations performed upon the personal data are registered and carried out only by authorised employees and associates of the Company.

5. The Controller takes every necessary action, including signing relevant agreements with the other Party (e.g. agreement on entrusting data for processing or access to data), so that subcontractors and other entities co-operating with the Company give their guarantee of employing relevant safety measures in each such case.

## **8. OUR USERS' RIGHTS**

1. Data subjects are entitled to the following rights:
  - 1) Right of information on processing of personal data - on this basis a person who makes a such a request is given information on processing of personal data by the Controller, including specifically purposes and legal bases for the processing, the scope of data in the hands, entities to which personal data are disclosed, and the planned date of their removal;
  - 2) Right to obtain a copy of data - on this basis the Controller gives a copy of the processed data on the data subject making a request;
  - 3) Right to rectify - on this basis the Controller erases possible inconsistencies or errors in terms of processing of personal data, and completes or updates data if they are incomplete or changed;
  - 4) Right to erasure - on this basis one may request that their data be erased if they are no longer needed for any purpose they have gathered for;
  - 5) Right to restrict processing - on this basis the Controller ceases to perform operation on personal data, except for the operations the data subject has agreed to, and except for data storage in line with the adopted rules of retention or until the reasons for processing of data persist (e.g. a decision of a supervisory body allowing further processing has been issued);
  - 6) Right to data portability - on this basis, within the scope the data are processed in connection with the agreement concluded or consent given, the Controller releases the data provided by the data subject in a computer-readable format. It is also possible that this data be required to be transferred to other entities - provided that, however, that there are technical possibilities both at the Controller's side and the other entity's side;
  - 7) Right to object to processing for marketing purposes - the data subject may object to processing of personal data for marketing purposes without the need to provide grounds;
  - 8) Right to object to processing for other purposes - the data subject may at any time object to processing of personal data for legitimate interest of the Controller (e.g. for analytical or statistical purposes, or for protection of property). Objection in this scope should include the grounds and be subject to the Controller's assessment.
  - 9) Right to withdraw consent - if the data are processed under a consent, the data subject has the right to withdraw it at any time, what, however, does not affect legality of processing which has been conducted upon the consent before its withdrawal;
  - 10) Right to lodge a complaint - in case of consideration that the processing of personal data breaches the provisions of the GDPR or other provisions regarding personal data protection, the subject data may lodge a complaint with Chairman of the Data Protection Office.

2. A request regarding exercising the rights of data subject may be sent in writing to the address: Huta Łaziska SA, ul. Cieszyńska 23, 43-170 Łaziska Górne or via e-mail: iod@hlsili.pl
3. The request should indicate as precise as possible what its scope is, i.e. in particular: the right the requesting party wishes to exercise (for example, right to receive the personal data, right to erasure etc.), what processing operation the request covers (for example, using a particular service), which processing purposes the request regards (for example, contact purposes, analytical purposes, etc.).
4. If the Controller is not able to determine the content of the request or identify the person filing the request based, they will ask the requesting person for additional information.
5. A response to the request will be given within a month of its filing. In case the time limit needs to be extended, the Controller shall inform the requesting person of the reasons for such an extension.
6. The response shall be given to the e-mail address the request was sent from, and in case of the request sent via mail - to the address indicated by the requesting person, unless they express the wish the response is sent to an e-mail address (in such a case, the e-mail address must be given).

## **9. ONLINE PLATFORM**

1) The Logintrade.Net Purchasing Platform is a solution based on on-line technologies designed for facilitating cooperation between the Buyers and the Suppliers. It is a Website of a closed nature, run by the Platform Operator (LT Serwis sp. z o.o. with its registered office in Warsaw, 00-644 Warsaw, at ul. Polna 48/11), where auctions and biddings are organised, requests for proposal are sent, offers are submitted, and other trade-related services are provided. The Platform allows the Suppliers to improve communication with companies interested in cooperation, it is also used for promotion of own products and brands.

a) In order to fully use the Platform's functionality, the User registers in the suppliers base of the Purchaser who has an Account, and by this they are granted access to the services provided within the Purchasing Platform.

b) Within the scope of managing the purchase platform, for the Suppliers, Counterparties, and Customers of the Purchaser registered on the Purchase Platform, the data controller is Logintrade S.A. with its registered office in Wrocław (the system administrator), who entrusts the data processing to LT Serwis sp. z o.o. with its registered office in Warsaw (the Platform Operator). The party responsible for the matters related to the processing of personal data, in particular: receiving and handling of requests, communication with the Supplier and the Purchaser, managing the Supplier base etc. is the Platform Operator. Detailed information on the scope and purpose of processing of personal data under the Logintrade.net Purchase Platform may be found at: <https://luma.logintrade.net/rejestracja/regulamin.html>.

c) In order to ensure a proper operation of the website, the Platform uses cookies. Detailed information on cookies, including the way of their operating, may be found at: <https://luma.logintrade.net/platforma-zakupowa,cookie.html>.

## **10. COOKIES**

1. When you visit our Website, it may store or collect information in your browser, mainly in the form of cookies. This information may pertain to you, your preferences or your device, and very often it is used for the Website to operate the way you expect it to operate. This information usually does not allow your identification directly but it may ensure you more personalised use of the Website. As we respect your right of privacy, you may not agree on some types of cookies, however rejecting them may affect the use of the Website and services we can offer.
2. Types of cookies we use:
  - 1) cookies necessary for website functioning that cannot be switched off in our system. These are usually set only in response to the User's actions and they concern asking for services such as privacy preferences settings, logging or filling forms. You may set your browser so that it blocks or warns about cookies but some websites are not going to work. Cookies do not store any personal data;
  - 2) performance cookies that allow counting visits and sources of traffic (measuring and improving the Website's efficiency). All information gathered by those cookies are aggregated and thus anonymous. If you do not allow those cookies, we will not know when you visited the Website and we will not be able to monitor its operations;
  - 3) functional cookies allow a website to provide better functionality and personalisation. They may be set by us or by external suppliers whose services have been added to our Website. If you do not allow those cookies, some of our services may not work properly;
  - 4) cookies to store information on a device or access to them. Files, devices' identifiers or other information may be stored on the User's device or shared on it for the purposes presented to the User;
  - 5) User's geolocation cookies that may be used for one or more purposes.
3. You may manage your preferences regarding cookies by choosing or allowing all cookies. In order to change cookies preferences, you need to click slider at the chosen category. You have a right to review your settings and to change it at any time.

## **11. CONTACT**

The Controller provide possibility to contact them via e-mail addressed mentioned at <https://hlsili.pl/kontakt/> and via given phone numbers. Using this form of contact requires disclosing personal data necessary to contact the User and to give them reply for their inquiry. The User may also provide other data in order to facilitate the contact or handling their inquiry. Providing data is required for acceptance and handling of an inquiry, and failure to do so results in impossibility to provide assistance. Personal data are processed only for the purpose of identification of the sender and handling of their inquiry.

## **12. CHANGES IN PRIVACY POLICY**

The policy is revised on an ongoing basis and updated, if necessary.