

## INFORMATION ON THE PROCESSING OF PERSONAL DATA AT MICHAEL / STRÖM DOM MAKLEKSKI S.A.

This document contains information on the processing of your personal data, as defined in 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 the GDPR or the General Data Protection Regulation of 27 April 2016.

### **1. Who will be the controller of your personal data and how to contact the Data Protection Officer?**

The controller of your personal data will be Michael / Ström Dom Maklerski S.A. (hereinafter as: Michael / Ström or MS). MS has its registered office in Warsaw, at the address: Al. Jerozolimskie 100, postcode: 00-807.

Michael / Ström conducts its brokerage activities in accordance with the adopted Articles of Association and on the basis of licences issued by the Polish Financial Supervision Authority (KNF).

You may contact MS by phone: +48 22 128 59 00, by email: dane.osobowe@michaelstrom.pl, or by post writing at the address indicated above.

To contact the Data Protection Officer, e.g. in order to exercise your rights referred to below or to report data protection violations, simply write to one of the addresses provided above, indicating the Data Protection Officer in the heading. Michael / Ström reserves the right to verify your identity when you make the above-mentioned requests.

### **2. For what purposes will Michael / Ström process your personal data and on what basis?**

Your personal data will be processed for the following purposes:

- conclusion of the contract and fulfilment of its terms and conditions;
- making the necessary financial settlements related to the services provided by MS;
- provision of services through the website and communication with you;
- marketing purposes, consisting in carrying out advertising campaigns and other similar activities related to the sale of products and services offered by Michael / Ström. Marketing may also consist in profiling - this means that MS will process your personal data taking into account your characteristics, behaviour or preferences. This way MS will tailor the commercial offers addressed to you so that they can meet your needs and interests;
- sending commercial information by Michael / Ström, if you have previously given your consent to it;
- compliance with legal obligations to which MS is subject under generally applicable law.

The basis for the processing of your personal data shall be:

- the consents you give us, in accordance with Article 6(1)(a) of the GDPR;
- the contract concluded by you with Michael / Ström, in accordance with Article 6(1)(a) of the GDPR;
- compliance with legal obligations to which MS is subject, in accordance with Article 6(1)(c) of the GDPR;
- MS's legitimate interests, in accordance with Article 6(1)(f) of the GDPR;

MS's legitimate interests shall be understood as ensuring the security of transactions carried out at MS, exercise of MS's claims or rights, direct marketing of services provided by MS, provision of services and communication via MS's websites.

If you give your consent, MS shall be entitled to process your personal data for marketing purposes even after the contract between you and MS has been terminated. Michael / Ström shall not process your personal data if you withdraw your previously given consent. The processing carried out prior to the withdrawal of consent shall continue to be lawful.

### 3. Who may be the recipient of your personal data?

In order to perform the services, MS shall have the right to transfer your personal data to other entities, i.e.:

- persons authorised by MS - such as MS's employees and associates, for whom access to your personal data is necessary in order to carry out their duties related to the performance of concluded contracts;
- persons or entities authorised by law, i.e. public authorities and others authorised to request access to such information, such as the Polish Financial Supervision Authority (KNF), the General Inspector of Financial Information, etc.;
- processors with which Michael / Ström has entered into relevant agreements;
- other data recipients, i.e. banks, couriers, law firms, etc., to which MS has entrusted the processing of your personal data.

Michael / Ström shall provide the legal basis for each sharing of your personal data.

### 4. Will your data be transferred outside the European Economic Area (EEA)?

Your personal data may be transferred outside the EEA for the purpose of using the services of IT solution providers (cloud computing) by Michael / Ström, which may store personal data on servers located outside the EEA (including United States). The transfer of your personal data outside the EEA will take place based on a decision of the European Commission finding an adequate level of protection of personal data under the legislation of a third country, or with the application of appropriate legal safeguards, which are in particular, standard contractual clauses for the protection of personal data approved by the European Commission, and in justified situations - also with measures that complement the tools of transfers in order to ensure compliance with the degree of protection of personal data of the European Union.

### 5. What rights do you have in connection with the processing of your personal data?

You have the following rights in connection with the processing of your personal data:

- Right to access information about what data concerning you is processed by Michael / Ström, and to obtain a copy of that data.
- Right to have your personal data rectified if it is inaccurate or have it completed if it is incomplete.
- Right to erasure of your personal data in the event of special circumstances, i.e. (i) when your personal data collected by MS is no longer needed by MS for the purposes of which you were informed, (ii) when you withdraw your consent to the processing of your personal data, (iii) unless MS is entitled to process your data on another legal basis, (iv) if your personal data has been processed unlawfully, (v) when the need to erase your personal data results from a legal obligation to which MS is subject.
- Right to data portability, i.e. to request that MS transmits your personal data to another controller.
- Right to restriction of the processing of your personal data - if you contest the correctness of your personal data, the processing is unlawful or MS no longer needs certain personal data, or when you have objected to the processing, you can also request that for a certain, necessary period of time (e.g. to verify the accuracy of your personal data or to exercise claims) MS does not perform any operations on your personal data, but only stores it.
- Right to object when Michael / Ström processes your personal data for purposes arising from its legitimate interests such as for instance carrying out marketing activities. As the consequence of your objection, the Controller shall cease processing your personal data for this purpose.
- Right to withdraw your consent - you have the right to withdraw your consent at any time regarding all consents previously given.

### 6. How long will Michael / Ström process your personal data?

Michael / Ström shall process your personal data for the period necessary to fulfil the purpose for which the data has been collected. In the case of:

- contract - MS may process your personal data for the time necessary for performance of the contract and then for other lawful purposes, e.g. to secure possible claims, i.e. up to 10 years, unless the law provides for a longer period;
- archiving of your personal data after the expiry of the contract - for the period provided for by law;
- compliance with a legal obligation to which MS is subject under generally applicable law - until MS has fulfilled the obligations resulting from the provisions of law;
- your consent - until you withdraw this consent;
- pursuing its legitimate interests by Michael / Ström - until their fulfilment or until you raise an objection.

Please note that the mere fact of withdrawing your consent to the processing of your data for marketing purposes does not deprive MS of its right to process your data. Michael / Ström may be obliged under another legal basis to process your personal data, in particular as regards its obligations arising from generally applicable law.

**Other information**

You have the right to lodge a complaint with the President of the Personal Data Protection Office should you consider that MS violates the provisions of the GDPR with regard to the processing of your personal data.

In order to conclude a contract with Michael / Ström, it is necessary for you to provide your personal data. If you do not provide MS with your personal data, MS will not be able to conclude a contract with you.

Your personal data shall not be transferred to third countries or international organisations.