



FIBERAX.COM PRIVACY AND COOKIES POLICY

When you, as a natural person, contact us, use our services, act on behalf of our business partner or client, or when we have obtained your Personal Data from other sources (e.g., publicly available industry websites or when your data has been disclosed to us as contact details for the purpose of contract execution), we begin processing your Personal Data. We handle all information about you responsibly and in compliance with applicable law—particularly 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").

The purpose of this document is to explain who we are, how we collect information, and what we do with it in the context of business, commercial, and marketing relations, as well as when you contact us. If anything is unclear or raises any concerns, please feel free to contact us.

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1. WHO ARE WE?

The controller of your Personal Data is Fiberax Sp. z o.o., with its registered office in Warsaw, . Pulawska 405a, unit 303, 02-801 Warsaw, Poland, Tax Identification Number (NIP): 9512571325, National Business Registry Number (REGON): 525646336, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw, XIII Commercial Division of the National Court Register, under KRS number 0001043360, with a share capital of PLN 1,000,000.00 (hereinafter referred to as the "Controller").

The Controller has appointed a Data Protection Officer, attorney-at-law Grzegorz Leśniewski, who can be contacted via email at: gdpr@fiberax.com.

2. KEY TERMS

Personal Data – any information that we process about you, such as your name, surname, email address, etc.;

Processing – any operation performed on your Personal Data, such as collection, storage, updating, or deletion;

Contractor – a consumer, a sole proprietor, a legal entity, or any other organizational unit with which the Controller establishes a business relationship;

Representative – a member of a governing body, a representative, or an attorney-in-fact of the Contractor with whom the Controller has entered into an agreement for the purpose of cooperation;

Contact Person – any natural person who communicates with employees, representatives, or attorneys-in-fact of the Controller to establish or execute business cooperation. A Contact Person may, in particular, be an employee of the Contractor or any other individual designated by or acting on behalf of the Contractor;

Website – the Controller's website, available at <https://fiberax.com/>;

Cloud – an organized telecommunication and IT system, consisting, in particular, of computer hardware, software, and telecommunication links, used for providing our services.



All terms/words used in the Privacy and Cookies Policy with an initial capital letter, not defined above, shall be understood in the meaning assigned to them in the Website Terms of Use, unless the context in which they are used clearly indicates a different meaning.

3. WHAT PERSONAL DATA WE COLLECT, THE PURPOSE, PERIOD, AND LEGAL BASIS FOR PROCESSING

3.1. VISIT TO THE WEBSITE

When you visit the Website, we may use cookies and other related technological solutions (detailed information is provided in section 6 of the Privacy and Cookies Policy), which allow us to ensure the proper functioning of the Website, as well as analyze information about your activity on the Website. We process this data to improve the quality of the services we offer and enhance the fun Website to your interests (profiling). We may use certain cookies for marketing purposes, both within the Website and on the websites of our business partners.

The legal basis for the use of cookies and similar technologies is, as a rule, your consent.

The legal basis for processing data collected using cookies is our legitimate interest or the legitimate interest of a "third party" (Article 6(1)(f) GDPR - including the need to ensure the highest quality of presented content, and in some cases, also marketing of products and services of ours or our partners; however, in such cases, partners do not participate in processing your data. To the extent that our partners may have direct access to this information, the legal basis for such processing is your voluntary consent (Article 6(1)(a) GDPR).

We process Personal Data based on your consent for a period of time until it is revoked. Personal Data processed on the basis of our legitimate interest may be stored until you object to its processing, except where, despite your objection, we conclude that there are important, legally justified grounds for processing, which override your interests, rights, and freedoms, or grounds for the establishment, exercise, or defense of claims.

This does not apply to cases where the use of cookies and similar technologies is necessary for the proper functioning of the Service (providing you with the electronic service), in which case we rely on legal provisions and, accordingly, on the necessity of processing for the performance of the Service Agreement (Article 6(1)(b) GDPR). Your Personal Data will then be processed for the period necessary to achieve these purposes.

Information about recipients of your Personal Data, including the potential transfer of your Personal Data to third countries (outside the European Economic Area), is detailed in section 5 below.

Your rights related to the processing of your Personal Data are detailed in section 7 below.

3.2. REGISTRATION IN THE WEBSITE (ACCOUNT)

To create an Account in our Website, we will require the provision of certain Personal Data, such as your first name, last name, and email address. Providing all information is voluntary; however, some data is necessary to enter into a Service Agreement, and failure to provide such data may mean that entering into such an agreement will not be possible.

Personal Data that is not required may help us improve the Service. We may also use this data for statistical purposes.

The purpose, as well as the legal basis for processing, is to conclude and properly perform the Service Agreement (Article 6(1)(b) GDPR) – e.g., to create your Account and store your Order history within the Account.

Your data may also be processed for marketing activities, such as displaying advertisements and offers (discounts), including those tailored to your interests based on profiling (the legal basis for these activities: Article 6(1)(f) GDPR, i.e., legitimate interest of the Controller or a third party (the Controller's or partners' direct marketing).

We may also process your Personal Data to detect any threats to privacy, fraud, or other malicious activities, as well as to prevent them and to establish, resolve, and pursue claims that may arise from the relationship between you and the Controller. In such a case, the legal basis for processing is our legitimate interest (Article 6(1)(f) GDPR).

We process your Personal Data for the duration of the Service Agreement. This period may be extended appropriately in connection with any claims (within the limitation period under the provisions of law, primarily the Civil Code) or legal proceedings – for the duration of such proceedings and settlement. In every case, a longer retention period for Personal Data applies.

Personal Data processed on the basis of our legitimate interest may be processed until you object to its processing, except where, despite your objection, we conclude that there are important, legally justified grounds for processing, which override your interests, rights, and freedoms, or grounds for the establishment, exercise, or defense of claims.

Information about recipients of your Personal Data, including the potential transfer of your Personal Data to third countries (outside the European Economic Area), is detailed in section 5 below.

Your rights related to the processing of your Personal Data are detailed in section 7 below.

3.3. PLACING ORDERS

When you place Orders through our Website, we process information related to the placement and fulfillment of Orders. For the purpose of placing an Order and entering into a Service Agreement (hereinafter: the "Agreement"), we will require the provision of certain Personal Data, such as your first name, last name, email address, postal address, and billing details. Providing all information is voluntary; however, some data is necessary to conclude the Agreement, and failure to provide such data may mean that entering into such an agreement will not be possible.

Personal Data that is not required may help us in improving our Service. We may also use this data for statistical purposes.



The purpose, as well as the legal basis for processing, is to conclude and properly perform the Agreement (Article 6(1)(b) GDPR) – e.g., delivering the Products you have ordered.

Your data may also be processed for marketing activities, such as displaying advertisements and offers (discounts), including those tailored to your interests based on profiling (the legal basis for these activities: Article 6(1)(f) GDPR, i.e., the legitimate interest of the Controller or a third party (the Controller's or partners' direct marketing).

Some of your Personal Data may also be processed for the purpose of handling and pursuing claims, as well as fulfilling legal obligations arising from applicable laws, e.g., tax and accounting obligations – the legal basis for processing is, accordingly, our legitimate interest (Article 6(1)(f) GDPR) or the necessity to fulfill a legal obligation (Article 6(1)(c) GDPR).

If you have concluded an Agreement with us, we process your Personal Data for the period necessary to perform it and usually for up to 7 years following the conclusion of the Agreement, as required, in particular, by tax regulations.

The processing periods described above may be appropriately extended in connection with any claims, including legal proceedings – for the duration of such proceedings and settlement, as well as if the law obliges us in some cases to process certain types of data for a longer period. In every case, a longer period of Personal Data storage applies.

Personal Data processed on the basis of our legitimate interest may be stored until you object to its processing, except where, despite your objection, we conclude that there are important, legally justified grounds for processing, which override your interests, rights, and freedoms, or grounds for the establishment, exercise, or defense of claims.

Information about recipients of your Personal Data, including the potential transfer of your Personal Data to third countries (outside the European Economic Area), is detailed in section 5 below.

Your rights related to the processing of your Personal Data are detailed in section 7 below.

3.4. CONTACTING US

When you contact us, for example by using email, available forms, social media, etc., examples of Personal Data we may process include: Personal Data that identifies you (e.g., email address, IP number, etc.), metadata related to the contact (e.g., contact date, duration of our conversation), as well as the content of our communication (e.g., email content). Your Personal Data is processed to respond to your inquiry, improve our communication, enhance customer service, and also for marketing purposes. The purpose of processing depends on the context of our communication; therefore, sometimes your Personal Data will be used to conclude the appropriate contract with you, and if we already have a contract in place, to ensure proper care during our cooperation (e.g., handling your complaint).

In such cases, the legal basis for processing depends on the context of the communication. If you contact us solely to obtain general information, for example about the Service, we process your Personal Data based on our legitimate interest (arising from the aforementioned purposes; Article 6(1)(f) GDPR). However, if your inquiry leads to the conclusion of an Agreement, the legal basis for processing will be Article 6(1)(b) GDPR - taking steps at the request of the data subject before entering into the contract. If we already have an Agreement in place and you contact us regarding its execution, the legal basis for our actions is Article 6(1)(b) GDPR – necessity for the performance of the contract.

Your Personal Data may also be processed for the purpose of handling and pursuing claims – the legal basis for processing is, accordingly, our legitimate interest (Article 6(1)(f) GDPR).

Providing Personal Data is voluntary, but necessary for effective communication with us.

If your Personal Data has been collected solely in connection with our current communication, we may process it, depending on the category of the information, for a period ranging from few days to several months (more detailed inquiries and conversations that may be relevant for our future contact).

Personal Data processed on the basis of our legitimate interest may be stored until you object to its processing, except where, despite your objection, we conclude that there are important, legally justified grounds for processing, which override your interests, rights, and freedoms, or grounds for the establishment, exercise, or defense of claims.

The principles of protection and use of Personal Data through social media, which you may use to contact us, are described in their privacy policies. For example, information about the processing of Personal Data by Facebook is available at: <https://www.facebook.com/policy.php>.

Information about the recipients of your Personal Data, including the potential transfer of your Personal Data to third countries (outside the European Economic Area), is detailed in section 5 below.

Your rights related to the processing of your Personal Data are detailed in section 7 below.

3.5. NEWSLETTER

We may send you commercial information about us and our Services (or our partners) through chosen communication channel, but only with your prior consent, also tailored to your interests based on profiling. The legal basis for processing your Personal Data for this purpose is our legitimate interest or the legitimate interest of our partners (Article 6(1)(f) of the GDPR) – ours or a third party's marketing purposes.

Providing Personal Data is voluntary, but necessary to subscribe to the Newsletter.

Your Personal Data may also be processed for the purpose of handling and pursuing claims – the legal basis for processing is, accordingly, our legitimate interest (Article 6(1)(f) GDPR).



Your Personal Data may be processed for the period during which it is necessary for our marketing activities, unless you object to its processing. A longer retention period may apply if the data is stored in case of potential claims, for the limitation period defined by law, particularly the Civil Code, or for the duration and settlement of legal proceedings. In any case, the longer retention period for Personal Data will prevail.

Information about the recipients of your Personal Data, including the potential transfer of your Personal Data to third countries (outside the European Economic Area), is detailed in section 5 below.

Your rights related to the processing of your Personal Data are detailed in section 7 below. **3.6. PROCESSING DATA OF OUR CONTRACTORS AND THEIR EMPLOYEES / COLLABORATORS**

If you are our Contractor or Representative, we may process your identification, contact, and contract-related data, including but not limited to your name and surname, the name of your employer, telephone number, email address, job title/ qualifications, and our possible correspondence. If you are a party to an agreement concluded with us, we will also process your registration data and information related to our financial settlements.

We process Personal Data for the proper execution of the contract between us and the Contractor, including documentation of its conclusion and the identification of persons authorized to perform tasks specified in the agreement. This is necessary to fulfill the Controller's legitimate interest (Article 6(1)(f) GDPR), which is the performance of a contract with our Contractor. If you, as a natural person, are a party to an agreement with us, your Personal Data will be processed for the purpose of performance of that agreement (Article 6(1)(b) GDPR).

Additionally, if we process your Personal Data for the following purposes:

- a. compliance with legal obligations (e.g., tax and accounting obligations), the legal basis for processing will be compliance with a legal obligation imposed on the Controller (Article 6(1)(c) GDPR);
- b. statistical, analytical, and marketing purposes, the legal basis for processing in such cases will be the legitimate interest of the Controller (Article 6(1)(f) GDPR). If the processing is conducted for marketing purposes, the legitimate interest arises from your consent to be contacted for marketing purposes via a specified communication channel;
- c. exercising, or defending against potential legal claims, the legal basis for processing will be our legitimate interest (Article 6(1)(f) GDPR).

Your data has been obtained either directly from you or from your employer/entity for whom you act as a Representative. The provision of Personal Data is voluntary; however, providing such data is a prerequisite for entering into a contract or for allowing you to perform tasks specified in the contract (failure to provide such data will prevent cooperation between us).

Information regarding the recipients of your Personal Data is detailed in Section 5 below.

The rights you are entitled to in relation to the processing of your Personal Data are described in Section 7 below.

3.7. BUSINESS RELATIONS

The scope of data we process depends on the information you or, for example, your employer provides to us, the method of communication you choose, and the information necessary for our business relationship. This scope primarily includes the content of documents, our correspondence/communication, and potentially other information obtained from publicly available sources related to our business relationship (e.g., industry platforms).

In particular, this includes:

- a. identification data, such as first and last name;
- b. contact details, including mailing address, phone number, email address, or other contact information.

If you use our hotline, electronic messengers, or email, we will process your identifying data (such as phone number, email address, or IP address), metadata related to the communication (such as the date of contact and call duration), and the content of our communication (such as chat history, email content, or call recordings, if you have been informed about such recordings in advance). We process this information to respond to your inquiries, improve our communication, enhance customer service quality, and for marketing purposes related to our services or the conclusion of a contract with you.

The legal basis for these activities depends on the context of the communication. If the communication involves general inquiries or discussions, the processing is based on our legitimate interest as the Controller (arising from the purposes mentioned above, Article 6(1)(f) GDPR). If your inquiry aims to conclude a contract or relates to an already concluded contract, the processing is based on taking steps at your request prior to entering into a contract or on the necessity of processing for the performance of a contract (Article 6(1)(b) GDPR).

Some of your data may have been obtained during a conference or industry event attended by our representatives, or from the event organizer. In such cases, business card details, inquiries, or participant list information may be processed in our database to send you information that may be of interest to you, respond to your inquiry and maintain future correspondence/contact on this matter, or send a thank-you message for the meeting or your participation in the event. In these cases, our legitimate interest serves as the legal basis of our actions (Article 6(1)(f) GDPR).

Regardless of the above, your Personal Data — primarily your first and last name, mailing address, or email address—may be used by us to send you occasional correspondence (e.g., holiday greetings) or to contact you regarding the promotion of the Controller's products or services. The legal basis for processing your Personal Data for this purpose is our legitimate interest (Article 6(1)(f) GDPR), which consists of maintaining our business relationship, building a positive image of the Controller, and marketing its products or services.

Additionally, in the case of processing your Personal Data for the following purposes:



- a. defense against potential claims, as well as the possible pursuit of claims, the legal basis for processing your personal data for this purpose is our legitimate interest (Article 6(1)(f) GDPR);
- b. compliance with the Controller's legal obligations (e.g., tax or accounting obligations), the legal basis for processing your Personal Data for this purpose is the fulfillment of legal obligations imposed on the Controller (Article 6(1)(c) GDPR).

In all cases, commercial information will only be sent to electronic addresses (email/phone) if you have provided your prior consent.

Personal Data collected solely in connection with ongoing communication, where you are not our Contractor, is stored depending on the category of information: for two years (in cases of more detailed inquiries and conversations that may be relevant for future contact) or until the limitation period for potential claims expires.

Providing your Personal Data is voluntary, but in certain cases, it may be necessary for our cooperation, e.g., for concluding or performing a contract, responding to an inquiry, or maintaining correspondence. This means that failure to provide such data may, in some situations, result in the Controller's refusal to establish cooperation or the initiation of legal steps to terminate a potential contract.

If data processing is based on your consent, please note that you may withdraw your consent at any time without affecting the lawfulness of processing carried out prior to withdrawal. However, if your data is processed based on the Controller's legitimate interest, you have the right to object to such processing.

Information about the recipients of your Personal Data is detailed in Section 5 below.

The rights you have regarding the processing of your Personal Data are outlined in Section 7 below.

3.8. USE OF OUR SERVICES - PURPOSES AND LEGAL BASES FOR PROCESSING

When you use our services, we also process information related to the provision of our services, such as data about usage, how the services are used, and the progress of the performance of the agreement, as well as any communication you may have with us. The purpose, as well as the legal basis for processing, is the proper performance of the concluded agreement (Article 6(1)(b) GDPR) – e.g., adjusting the parameters of infrastructure, generating invoices. The scope of data we may process, in addition to GDPR, also results specifically from Article 18 of the Act on the Electronic Provision of Services. At the registration stage, the data necessary to create an account are appropriately marked. Providing all the information is voluntary, but some data (appropriately marked at the registration stage) are necessary to conclude the agreement and for us to begin providing services.

If you have been added as a user of services by our client (including, for example, as a contact person or someone authorized to make changes to the service configuration), we process your data, such as email address, other contact details, data about the usage of services, the progress of the agreement, and any communication you have with us. The legal basis for our actions is our legitimate interest (Article 6(1)(f) GDPR), namely the performance of the agreement with our client.

Additionally, we may analyze information about traffic to/from your virtual machines that we provide to you, to ensure the security of the Cloud and prevent abuse. In this case, the legal basis for our actions is our legitimate interest (Article 6(1)(f) GDPR).

Some information is processed to fulfill legal obligations imposed by law – this mainly applies to data related to our settlements (tax regulations; Article 6(1)(c) GDPR). As a rule, we do not analyze or review the content that you store on our servers. Moreover, such actions will be impossible for us if you appropriately encrypt the data.

4. HOW LONG DO WE PROCESS YOUR DATA?

As a rule, unless stated otherwise, data processed based on our legitimate interest will be processed until you object to the processing or until the purpose for which it was collected has been fulfilled.

Data processed solely based on consent will be stored until you withdraw your consent or until the purpose for which the consent was granted has been fulfilled.

Data related to contract performance, including data of Representatives and Contact Persons, will be retained for the duration of the contract and typically for up to 7 years after its termination, in accordance with tax regulations and the limitation periods for certain claims.

These retention periods may be extended as necessary in the event of potential claims or legal proceedings - for the duration of such proceedings and their resolution - as well as if the applicable law requires us to process the data for a longer period in specific cases.

5. WHO ACTUALLY HAS ACCESS TO YOUR PERSONAL DATA?

Access to your Personal Data is granted exclusively to:

- a. duly authorized employees or associates of the Controller, who are obliged to maintain confidentiality and to use the data only for the purposes for which the Controller obtained it;
- b. entities supporting us in providing services, under data processing agreements, such as email marketing platforms, IT service providers, or communication tool providers (e.g., [communicators](#));
- c. legal, consulting, accounting, and tax service providers;
- d. audit service providers;
- e. postal operators and couriers;
- f. entities providing archiving services;
- g. entities that you may use while using our services, such as payment service providers;
- h. affiliated companies of the Controller, e.g., for organizational support in the use of tools or the provision of certain services on our behalf.

All of these entities have access only to the information necessary for performing specific actions.



Fiberax may also be obliged to disclose certain information to public authorities (e.g., law enforcement agencies, courts, tax offices) as part of ongoing proceedings. In such cases, information is disclosed only if there is a proper legal basis for such disclosure.

In some cases, certain service providers we work with may be located outside the European Economic Area (EEA). Whenever data is transferred outside the EEA, we apply the required safeguards, including Standard Contractual Clauses (SCCs) adopted by the European Commission. Additionally, to ensure data protection during transmission and after receipt, we implement widely accepted security standards compliant with GDPR requirements. You have the right to obtain a copy of the safeguards we apply when transferring Personal Data to a third country by contacting us at: gdpr@fiberax.com.

6. WHAT ARE "COOKIES" AND OTHER SIMILAR TECHNOLOGIES? HOW AND FOR WHAT PURPOSES DO WE USE THEM?

Cookies are small text files sent by a server and stored on your device (usually on your computer's hard drive). These files store information that we may need to adjust our website to your preferences and to collect statistical data.

During your visit to our website, we may collect data such as the operating system type, your IP address, the web pages you visit, the elements you download, operational data or location information about the device you use.

We ensure that all information obtained in this manner is used only for the purposes specified in this policy and is not harmful to you or your device, as it does not introduce any configuration changes to your system.

Of course, you can change the way cookies are used, including blocking or deleting them entirely via your web browser settings. However, please note that such actions may prevent or significantly hinder the proper functioning of our website, potentially causing considerable slowdowns in performance. Therefore, we recommend not disabling cookies in your browser.

We always provide our Clients with precise information about the specific cookies we use and their purposes during their first visit to our Website.

Cookies Used on the Website:

- a. **Essential (technical) cookies** - these are cookies that are necessary for the proper functioning of the website. They enable core functionalities but do not track users in any way;
- b. **Analytical cookies** - these are used to analyze user behavior on the website for statistical and analytical purposes (e.g., improving website performance). These cookies help collect information such as the number of visitors, bounce rate, traffic sources, and other website metrics.

To view a detailed description of the cookies we use (including the provider, type of file, and purpose of use), click the 'Customize' button on the cookie banner displayed when you enter the Service. You can also manage cookies at any time from any subpage of the Service - simply hover your cursor over the graphical cookie icon visible in the corner of the page. By clicking the icon, you can change the cookie settings or disable them.

Third-Party Cookies

We may also collaborate with other companies for their marketing (advertising) or analytical activities. As part of this collaboration, cookies from these entities may be stored on your device. These are known as third-party cookies.

These entities, by placing their own cookies on our Website, may become controllers of your Personal Data.

We may use the following entities or services that place cookies in the Service. Detailed information regarding their data processing policies can be found in their respective privacy policies.

- a. Google Tag Manager, <https://www.google.com/analytics/terms/tag-manager/>;
- b. Google Analytics, <https://policies.google.com/technologies/partner-sites?hl=pl>;
- c. Meta Platforms, Inc., <https://www.meta.com/pl/legal/privacy-policy/>

Managing Cookies

You can change the way cookies are used at any time by managing your consents via the privacy settings on our Service or through browser settings. In particular, you may withdraw your previously given consent - however, this will not affect the lawfulness of processing carried out based on consent before its withdrawal.

You can manage cookies at any time from any subpage of the Service - simply hover your cursor over the graphical cookie icon visible in the corner of the page. By clicking the icon, you can change the cookie settings or disable them.

You can also withdraw consent for the use of cookies via browser settings. Browser developers provide help pages explaining how to manage cookies in their products. For more information, refer to the links below:

[Google Chrome](#)
[Edge](#)
[Internet Explorer](#)
[Mozilla Firefox](#)
[Safari \(Desktop\)](#)
[Safari \(Mobile\)](#)
[Opera](#)

For other browsers, please refer to the documentation provided by the browser manufacturer.



You can also obtain information about privacy settings in your browser using the following tool:
<http://www.youronlinechoices.com/pl/twojetybory>

7. WHAT ARE YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA BY THE CONTROLLER, AND HOW CAN YOU EXERCISE THEM?

Please note that the instructions below regarding the method or form of contacting us are recommendations only, not mandatory requirements.

Right of Access to Personal Data

You may request access to your Personal Data at any time to see what data we process about you and to obtain detailed information on:

- a. whether we process your Personal Data,
- b. for what purposes,
- c. what categories of data we process,
- d. who the recipients of your data are,
- e. where possible, the planned retention period, or, where this is not possible, the criteria for determining that period,
- f. if Personal Data was not collected from you directly, any available information about its source.

To facilitate the information request process, please send access requests to gdpr@fiberax.com, with "Data Access – GDPR" in the subject line.

Right to Rectification of Personal Data

If you believe that the information we process about you is incorrect or incomplete, you have the right to request rectification of any inaccurate or incomplete data. To facilitate the rectification process, please send correction or update requests to gdpr@fiberax.com, with "Data Rectification – GDPR" in the subject line.

Right to Erasure of Personal Data

Under certain circumstances, GDPR grants you the "right to be forgotten". Situations that may justify such a request include:

- a. your Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed;
- b. you have withdrawn your consent to the processing of Personal Data, and there is no other legal basis for continued processing;
- c. you have objected to the processing, and there are no overriding legitimate grounds for the processing;
- d. you have objected to the processing of your Personal Data for marketing purposes;
- e. your Personal Data has been unlawfully processed;
- f. the erasure of your data is required to comply with a legal obligation under EU or Member State law to which the Controller is subject.

To facilitate the erasure request process, please send deletion requests to gdpr@fiberax.com, with "Data Erasure – GDPR" in the subject line.

Right to Restriction of Processing

You have the right to request restriction of the processing of your Personal Data in the following circumstances:

- a. you contest the accuracy of the Personal Data we process – for a period allowing us to verify its accuracy,
- b. your Personal Data is being processed unlawfully, but instead of requesting erasure, you prefer to restrict processing,
- c. we no longer need your Personal Data for processing purposes, but you require it for the establishment, exercise, or defense of legal claims,
- d. you have objected to the processing of your Personal Data – restriction will apply only until the dispute is resolved. If your request for restriction is granted, our processing activities related to the specified data and to specific operations/purposes of processing, will be limited to the minimum necessary – essentially only storage.

To facilitate the restriction request process, please send requests to gdpr@fiberax.com, with "Restriction of Processing – GDPR" in the subject line.

Right to Data Portability

You have the right to receive your Personal Data in a commonly used, machine-readable format and to transfer it to another controller.

This right applies if:

- a. processing is based on your consent or a contract; and
- b. processing is carried out by automated means.

To facilitate the data portability request process, please send requests to gdpr@fiberax.com, with "Data Portability – GDPR" in the subject line.

Right to Object

In certain situations, you have the right to object to the processing of your Personal Data. You may exercise this right in the following cases:



- a. when processing is based on the necessity to perform a task carried out in the public interest or in the exercise of official authority vested in the Controller, including profiling, and you object on grounds related to your particular situation,
- b. when processing is based on the Controller's or a third party's legitimate interest, including profiling, and you object on grounds related to your particular situation,
- c. when your Personal Data is processed for direct marketing purposes, you may object at any time, to the extent that the processing is related to such direct marketing,
- d. when your Personal Data is processed for statistical purposes, and you object on grounds related to your particular situation.

However, please note that if, despite your objection, we determine that there are compelling, legitimate grounds for processing that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims, we will continue to process your data subject to the objection. If you disagree with our assessment of the situation, you have the right to lodge a complaint with the supervisory authority (more details below).

To facilitate the objection request process, please send objections to gdpr@fiberax.com, with "Objection – GDPR" in the subject line.

Right to Lodge a Complaint with the Supervisory Authority

As we act as the Controller of your Personal Data, you have the right to lodge a complaint with a supervisory authority.

However, if you have any concerns about how we process your data, we encourage you to contact our Data Protection Officer first at gdpr@fiberax.com. The DPO is an independent individual within our organization responsible for ensuring full compliance with Personal Data processing regulations. If we have made an error, the DPO will take the necessary corrective actions.

If you choose to file a complaint with a supervisory authority, you can find a list of national data protection authorities in the European Union, along with their contact details, on the European Data Protection Board (EDPB) website: https://edpb.europa.eu/about-edpb/board/members_en. In Poland, the competent supervisory authority is the President of the Personal Data Protection Office (PUODO). A detailed description of the procedure for lodging a complaint with PUODO is available on PUODO's official website: <https://uodo.gov.pl/pl/83/155>.

8. CURRENT VERSION OF THE POLICY

This policy is effective as of []

Z komentarzem [EK1]: To be added