Fundacja citi handlowy

PERSONAL DATA PROCESSING POLICY OF THE CITI HANDLOWY LEOPOLD KRONENBERG FOUNDATION (TRANSPARENCY POLICY)

1. DEFINITIONS

1.1. **Controller** or **the Foundation** – The Citi Handlowy Leopold Kronenberg Foundation in Warsaw.

1.2. **Personal Data** - information about a natural person identified or identifiable by reference to one or several special identifiers determining the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person, including the image, voice recording, contact details, location data, information contained in correspondence, information collected through a recording device or other similar technology.

1.3. **Policy** – this Personal Data Processing Policy.

1.4. **GDPR** – 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.

1.5. **Data Subject** – a natural person to whom the personal data processed by the Controller relates.

2. DATA PROCESSING BY THE CONTROLLER

2.1. In connection with its activities, the Foundation collects and processes Personal Data in accordance with the relevant provisions of law (including in particular the GDPR) and the data processing rules provided therein.

2.2. The Foundation ensures transparency in the processing of Personal Data, in particular, it always informs about the processing of data at the time of its collection, including the purpose and legal basis of the processing (e.g. when concluding a contract for the sale of goods or services). The Foundation ensures that data is collected only to the extent necessary to achieve the indicated purpose and processed only for the period in which it is necessary.

2.3. When processing Personal Data, the Foundation ensures its security and confidentiality, as well as access to information about the processing to Data Subjects. If, despite the security measures applied, there is a breach of personal data protection (e.g. "leakage" of data or its loss), the Foundation will inform the Data Subjects of such an incident in a manner consistent with the regulations.

3. CONTACT WITH THE CONTROLLER

3.1. The Controller can be contacted via the email address poczta@kronenberg.org.pl or at the correspondence address: 00-067 Warszawa [Warsaw], ul.Traugutta 7/9.

4. SECURITY OF PERSONAL DATA

4.1. To ensure the integrity and confidentiality of data, the Controller has implemented procedures allowing access to Personal Data only to authorized persons and only to the extent necessary for the tasks performed by them. The Controller applies organizational and technical measures to ensure that all operations on Personal Data are registered and performed only by authorized persons.

4.2. Furthermore, the Controller takes all necessary steps to ensure that its subcontractors and other associated entities guarantee the application of appropriate safeguards whenever they process personal data on behalf of the Controller.

4.3. The Controller conducts an ongoing analysis of the risk associated with the processing of Personal Data and monitors the adequacy of the data safeguards applied to the identified threats. If necessary, the Controller implements additional measures to enhance data security.

5. THE PURPOSES AND THE LEGAL BASIS OF PROCESSING

VOLUNTEERING ACTIONS

5.1. The processing of volunteers' data is carried out in connection with their applications for financial or organizational support pursuant to Article 6(1)(b) of the GDPR. Volunteers may also report other persons who will participate in the action – in this case, the processing is based on the Foundation's legitimate interest (Article 6(1)(f) of the GDPR). Registered persons can object to the processing of their data by the Foundation at any time.

5.2. In addition, volunteers' data may be processed for the purpose of:

5.2.1. fulfilling the Foundation's public law obligations resulting primarily from tax regulations and those relating to volunteering and the operation of public benefit organizations – the legal basis for data processing is the fulfilment of a legal obligation to which the Foundation is subject (Article 6(1)(c) of the GDPR);

5.2.2. statistical and analytical purposes connected with projects carried out by the Foundation – the legal basis for processing is a legitimate interest of the Foundation (Article 6(1)(f) of the GDPR); the Foundation’s legitimate interest consists in the possibility of preparing analyses and statistics related to its activity;

5.2.3. implementation of internal administrative objectives of the Foundation – the legal basis for processing is a legitimate interest of the Foundation (Article 6(1)(f) of the GDPR); the Foundation’s legitimate interest consists in the implementation of internal administrative objectives of the Foundation, including effective management of the volunteering program;

5.2.4. provision of additional trainings/workshops for the development of volunteers – the legal basis for processing is a legitimate interest of the Foundation (Article 6(1)(f) of the GDPR); the Foundation’s legitimate interest consists in the possibility to provide additional benefits for volunteers;

5.3. In certain cases, the Foundation also processes the data of persons – beneficiaries of the actions it organizes (e.g. participants of workshops for seniors, trainings, etc.). In such a case, the processing takes place for the purpose of organizing a given activity and, if necessary, for purposes related to its settlement and the fulfilment of statutory obligations (in particular tax and accounting obligations) in this regard. The legal basis for data processing is in this case Article 6(1)(f) and (c) of the GDPR.

ORGANIZATION AND DOCUMENTATION OF EVENTS

5.4. In the case of organizing various types of events (e.g. contests, galas, etc.) by the Foundation, the Foundation may document such events through video recordings or photos. In principle, in such cases, the Foundation publishes images of a larger number of people, in such a way that it is not possible to identify specific guests.

5.5. In special cases, if the Foundation intends to use the image of specific people for promotional purposes and publish them in publicly available communication channels, it obtains their consent to disseminate their image. Such consent may be withdrawn under the terms and conditions agreed with the Foundation.

ORGANIZATION OF CONTESTS AND SUPPORT BY EXPERTS

5.6. In connection with the Foundation's activity, Personal Data may be processed for the purpose of organizing and conducting a contest. The legal basis for processing is a legitimate interest of the Foundation (Article 6(1)(f) of the General Data Protection Regulation 2016/679 – "**GDPR**"); the Foundation's legitimate interest consists in the provision of the contest and selection of winners

5.7. In certain cases, experts, institutions or non-governmental organizations may nominate natural persons for contests organized by the Foundation. In such a case, the processing of Personal Data of such persons is based on the Foundation's legitimate interest consisting in the implementation of its statutory objectives.

SOCIAL RESEARCH ORGANIZED BY A RESEARCH INSTITUTE

5.8. In the case of participation in events organized by the Foundation, Personal Data may be transferred to external research institutions for the purpose of conducting social research. Therefore, Personal Data may be processed by the Foundation for statistical and analytical purposes related to the projects carried out by the Foundation – the legal basis for data processing is the Foundation's legitimate interest (Article 6(1)(f) of the GDPR); the Foundation's legitimate interest consists in the possibility of conducting analyses and statistics concerning its activity;

ORGANIZATION OF TRAINING PROJECTS

5.9. When the Foundation organizes training projects, Personal Data is processed:

5.9.1. for the purpose of recruiting persons for a training project organized by the Controller – the legal basis for data processing is to undertake

activities at the request of the Data Subject prior to the conclusion of the contract (Article 6(1)(b) of the GDPR);

5.9.2. for the purpose of implementing public law obligations imposed on the Foundation resulting primarily from tax regulations and the provisions on public benefit activities and volunteering - the legal basis for processing is the fulfillment of a legal obligation to which the Foundation is subject (Article 6(1)(c) of the GDPR);

5.9.3. for statistical and analytical purposes connected with projects carried out by the Foundation – the legal basis for processing is a legitimate interest of the Foundation (Article 6(1)(f) of the GDPR); the Foundation's legitimate interest consists in the possibility of preparing analyses and statistics related to its activity

5.9.4. for the purpose of conducting a series of trainings by the Controller – in the case of qualifying as a training participant as a result of the recruitment process – the legal basis for processing is its necessity for the performance of the contract (Article 6(1)(b) of the GDPR);

5.10. In connection with the possibility of using the Google Forms tool, Personal Data may be collected by Google for its own purposes related to the online form service provided. For more information on the processing of Personal Data by Google, please refer to Google's Privacy Policy at the following link: https://policies.google.com/privacy?hl=pl.

5.11. Personal Data will be processed until the end of the recruitment for the project, and in the case of participation in trainings organized by the Controller until the end of the training cycle. The processing period may be extended in each case by the statutory limitation period for claims, as well as to the extent that a longer data retention period results from legal provisions.

EMAIL AND TRADITIONAL CORRESPONDENCE

5.12. In the case of addressing correspondence not related to any contract with the Foundation or to any relationship with the Foundation via email or traditional mail sent to the Foundation, then the Personal Data contained in such correspondence is processed solely for the purpose of communication and resolution of the matter to which the correspondence relates.

5.13. The legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in conducting correspondence addressed to the Controller in connection with its business activity.

5.14. The Controller processes only Personal Data relevant to the matter to which the correspondence relates. All correspondence is stored in a manner that ensures the security of the Personal Data (and other information) contained therein and is disclosed only to authorized persons.

TELEPHONE CONTACT

5.15. In the case of contacting the Controller by telephone, in matters not related to the concluded contract or actions or initiatives carried out by the Foundation, the Controller may request Personal Data only if it is necessary to handle the matter to which the contact relates. In such a case, the legal basis is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in

the necessity to resolve the submitted matter related to its business activity.

DONATIONS

5.16. In the case of making donations to the Foundation's account, the Foundation processes the Personal Data of donors only to the extent related to the related bank transaction and in order for the Foundation to fulfil its obligations under the law, including, in particular, tax regulations – the legal basis for the processing is a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR in connection with the provisions of tax and accounting laws).

RECRUITMENT

5.17. As part of the recruitment processes, the Controller expects Personal Data to be provided (e.g. in a CV or resume) only to the extent specified in the provisions of the labor law. Therefore, information should not be provided to a wider extent. In the event that the submitted applications contain additional data beyond the scope indicated by the provisions of the labor law, its processing will be based on the candidate's consent (Article 6(1)(a) of the GDPR), expressed through an unambiguous confirmatory action, which is the sending of application documents by the candidate. In the event that the submitted applications contain information inadequate to the purpose of recruitment, such information will not be used or considered in the recruitment process.

5.18. Personal Data is processed:

5.18.1. in the event that the preferred form of employment is an employment contract – in order to perform obligations resulting from the provisions of law related to the employment process, including, in particular, the Labor Code – the legal basis for the processing of data is the legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR in conjunction with the provisions of the labor law);

5.18.2. if the preferred form of employment is a civil law contract – for the purpose of conducting the recruitment process – the legal basis for the processing of data contained in the application documents is to take steps at the request of the Data Subject prior to entering into the contract (Article 6(1)(b) of the GDPR);

5.18.3. for the purpose of carrying out the recruitment process in the scope of data not required by law or by the Controller, as well as for the purposes of future recruitment processes – the legal basis for the processing of data is consent (Article 6(1)(a) of the GDPR);

5.18.4. for the purpose of verifying the qualifications and skills of the candidate and determining the terms of cooperation – the legal basis for the processing of data is the Controller's legitimate interest (Article 6(1)(f) of the GDPR). The Controller's legitimate interest is the verification of job candidates and the specification of the terms of possible cooperation;

5.18.5. for the purpose of establishing or pursuing possible claims by the Controller or for the purpose of defending against claims raised against the Controller – the legal basis for the processing of data is the Controller's legitimate interest (Article 6 (1) (f) of the GDPR).

5.19. To the extent that Personal Data is processed on the basis of granted consent, this consent may be withdrawn at any time, without affecting the lawfulness of the processing of data carried out prior to its withdrawal. If the consent is granted for the purposes of future recruitment processes, the Personal Data will be deleted after two years – unless the consent has been withdrawn earlier.

5.20. Providing data to the extent specified in Article 22(1) of the Labor Code is required – in the case of the candidate's preference for employment based on an employment contract – by the provisions of law, including specifically the Labor Code, and in the case of preference for employment based on a civil law contract – by the Controller. The consequence of not providing this data is the inability to consider a given job application in the recruitment process. Providing other data is voluntary.

COLLECTING DATA IN CONNECTION WITH THE PERFORMANCE OF CONCLUDED CONTRACTS

5.21. In the case of data collection for purposes related to the performance of a specific contract, the Controller provides the Data Subject with detailed information on the processing of his/her Personal Data at the time of concluding the contract or at the time of obtaining the Personal Data in the event that the processing is necessary for the Controller to take steps at the request of the Data Subject prior to entering into the contract.

PROCESSING OF PERSONAL DATA OF CONTACT PERSONS AND STAFF MEMBERS OF ENTITIES COOPERATING WITH THE CONTROLLER

5.22. In connection with its statutory activity, the Controller obtains data from persons involved in the implementation of activities necessary for its performance (e.g. persons authorized to contact in connection with the submitted application for a grant or co-financing, organized contests or other activities, etc.). The scope of the data provided is in every case limited to the extent necessary for the performance of the contract and usually does not include information other than name and surname and business contact details.

5.23. Such Personal Data is processed in order to pursue the Controller's legitimate interest and its contractor's legitimate interest (Article 6(1)(f) of the GDPR), which consist in enabling the proper and effective performance of the contract. Such data may be disclosed to third parties involved in the performance of the contract, as well as to entities gaining access to the data based on the provisions on the disclosure of public information and proceedings conducted under the public procurement law, to the extent provided for by such provisions.

5.24. The data is processed for the period necessary to pursue the above interests and perform the obligations arising from the provisions.

ONLINE EVENTS

5.25. In connection with the organization of various types of conferences – these actions may be carried out remotely using selected applications that allow for organizing meetings in the form of online meetings. Therefore, the Personal Data of the participants of these events will also be processed for the purpose of organizing events in a remote form. The legal basis for processing the data is the Controller's legitimate interest consisting in the possibility of organizing events remotely.

ON-SITE EVENTS

5.26. In the case of the organization by the Foundation of events in the form of on-site events (i.e. conferences, lectures), the Personal Data of event participants is processed:

5.26.1. For the purpose of registering for the event and participating in the event - the legal basis for the processing is the necessity of the processing for the performance of the contract for the provision of services (Article 6(1)(b) of the GDPR,

5.26.2. for statistical and analytical purposes connected with projects carried out by the Foundation – the legal basis for processing is a legitimate interest of the Foundation (Article 6(1)(f) of the GDPR); the Foundation's legitimate interest consists in the possibility of preparing analyses and statistics related to its activity;

COLLECTION OF DATA IN OTHER CASES

5.27. In connection with its activity, the Controller also collects Personal Data in other cases – e.g. by building and using permanent mutual business contacts (*networking*) during meetings and industry events or through the exchange of business cards – for purposes related to initiating and maintaining contacts necessary for the statutory activity performed. In this case, the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in creating a network of contacts in connection with the conducted activity.

5.28. The Personal Data collected in such cases is processed only for the purpose for which it was collected, and the Controller ensures appropriate protection for the data.

6. DATA RECIPIENTS

6.1. In connection with conducting activities requiring processing, Personal Data is disclosed to external entities, including in particular service providers responsible for operating IT systems, entities providing accounting services or couriers. Data related to activities in the area of volunteering is also disclosed to entities belonging to the Citi Handlowy capital group. For more information on the capital group of the Controller please refer to http://www.citibank.pl/poland/homepage/polish/index.htm

6.2. In addition, the Personal Data of volunteers, partners, lecturers participating in actions, contests, events organized by the Foundation may be transferred to third parties involved in the organization of a given event.

6.3. The Controller reserves the right to disclose selected information concerning the Data Subject to the competent authorities or third parties who request such information, based on an appropriate legal basis and in accordance with the provisions of applicable law.

7. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

7.1. The level of protection of Personal Data outside the European Economic Area ("**EEA**") differs from that provided by European law. For this reason, the Controller transfers Personal Data outside the EEA only when it is necessary and with an adequate level of protection, primarily by:

7.1.1. cooperating with entities processing Personal Data in countries for which an appropriate decision of the European Commission has been issued regarding the determination of the adequate level of protection of Personal Data;

7.1.2. using standard contractual clauses issued by the European Commission, with appropriate safeguards ensured;

7.1.3. applying binding corporate rules approved by the competent supervisory authority, with appropriate safeguards ensured;

7.2. The Controller always informs about the intention to transfer Personal Data outside the EEA at the stage of its collection.

7.3. Personal data may be transferred to an IT service provider company located outside the European Economic Area (EEA), i.e. in the USA – the transfer will be made with appropriate safeguards, including on the basis of Standard Contractual Clauses.

8. PERIOD OF PERSONAL DATA PROCESSING

8.1. The period for which the Controller processes Personal Data depends on the type of relationship with the Data Subject and the purpose of the processing of data. The period of data processing may also result from the regulations when they constitute the basis for the processing. In the case of data processing on the basis of the Controller's legitimate interest (e.g. for security reasons), the data is processed for a period enabling the implementation of this interest or for the purpose of raising an effective objection to the processing of data. If the processing of data is based on consent, the data is processed until its withdrawal. When the basis for the processing is the necessity to conclude and perform a contract, the data is processed until the contract is terminated.

8.2. The period of data processing may be extended if the processing of data is necessary to establish and pursue or defend any claims, and thereafter, only if and to the extent required by law.

9. RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA

DATA SUBJECT RIGHTS

9.1. Data Subjects have the following rights:

9.1.1. **the right to information about the processing of Personal Data** – on this basis, the Controller provides the natural person submitting the request with information about the processing of data, including, in particular, the purposes and legal bases of processing, the scope of the data held, the entities to whom it is disclosed, and the planned date of data deletion;

9.1.2. **the right to obtain a copy of the data** – on this basis, the Controller provides a copy of the processed data concerning the natural person submitting the request;

9.1.3. **the right to rectification** – the Controller is obliged to remove any inconsistencies or errors of the processed Personal Data and to supplement it if the data is incomplete;

9.1.4. **the right to erasure** – on this basis, the deletion of data can be requested if its processing is no longer necessary to achieve any of the purposes for which it was collected;

9.1.5. **the right to restriction of processing** – in the event of such a request, the Controller ceases to perform operations on Personal Data – with the exception of operations to which the Data Subject has consented – and to store the data, in accordance with the adopted retention rules or until the reasons for the restriction of data processing cease to exist (e.g. a decision of the supervisory authority permitting further data processing is issued);

9.1.6. **the right to data portability** – on this basis – to the extent that the data is processed in an automated manner in connection with the concluded contract or granted consent – the Controller issues the data provided by the Data Subject in a format that allows the data to be read by a computer. It is also possible to request the transfer of such data to another entity, however, provided that there are technical possibilities in this regard both on the part of the Controller and the indicated entity;

9.1.7. **the right to object to data processing for marketing purposes** – the Data Subject may at any time object to the processing of Personal Data for marketing purposes, without the need to justify the objection;

9.1.8. **the right to object to other purposes of data processing** – the Data Subject may at any time object – for reasons related to his/her particular situation – to the processing of Personal Data that is carried out on the basis of the Controller's legitimate interest (e.g. for analytical or statistical purposes or for reasons related to the protection of property); the objection in this regard should include a justification;

9.1.9. **the right to withdraw consent** – if the data is processed on the basis of the consent, the Data Subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before its withdrawal;

9.1.10. **the right to lodge a complaint** – if it is considered that the processing of Personal Data violates the provisions of the GDPR or other provisions concerning the protection of Personal Data, the Data Subject may lodge a complaint with the authority supervising the processing of Personal Data, competent for the place of habitual residence of the Data Subject, his/her place of work or the place of the alleged violation. The supervisory authority in Poland is the President of the Personal Data Protection Office (UODO).

SUBMITTING REQUESTS RELATED TO THE EXERCISE OF RIGHTS

9.1. A request for the exercise of the rights of Data Subjects can be submitted:

9.1.1. in writing to the address: 00-067 Warszawa [Warsaw], ul. Traugutta 7/9;

9.1.2. by email to the email address: poczta@kronenberg.org.pl

9.2. In the event that the Foundation is unable to identify a natural person on the basis of the submitted request, it will ask the applicant for additional information. Providing such data is not mandatory, but failure to provide it will result in the refusal to comply with the request.

9.3. The procedure concerning submitted requests is free of charge. Fees may be collected only in cases provided for by law.

10. POLICY CHANGES

10.1. The Policy is reviewed on an ongoing basis and updated if necessary. The valid version of the Policy was adopted on 29 April 2021.