Data Processing Notice

This Data Processing Notice contains information related to the processing of personal data realised within the framework of the Individual Contract in the issue of Positioning and Toll Declaration Operator Data Servicing, on the https://www.polish-etoll.eu website operated by **WEBEYE POLSKA Sp. Z.o.o.** (Seat: PL-30663 Kraków, ulica Wielicka 250., registration number: 0000317943)

Contact information:

Address: PL-30663 Kraków, ulica Wielicka 250.

E-mail address: info@pl.webeye.euwebey

Telephone number: +48 12 278 42 43

1. The set of processed data, the legal basis and purpose of data processing, and the period of data processing

1.1. Data processing necessary for contracting

Description of types of data processing

It is possible to conclude a Contract For Toll Declaration Operator's Data Servicing on the website.

In the interest of contracting, we process the following data concerning you:

- name,
- e-mail address,
- telephone number.

In addition to this, under the General Contracting Terms For Toll Declaration Operator's Data Servicing **WEBEYE POLSKA Sp. Z.o.o.** has notification obligations in respect of the person specified in the GCT as the *Person To Be Informed*, due to which the notification data, i.e. the name, telephone number and e-mail address of the Person To Be Informed under the GCT are to be provided.

Providing and processing the data are indispensable for contracting.

Legal basis and purpose of data processing

The legal basis of data processing in the case of the data used for contracting, based on point a) of Article 6(1) of Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation (hereinafter **"Regulation" or** "**GDPR**") is your freely given consent, in the case of the data of the Person To Be Informed , based on point f) of Article 6(1) of GDPR, the legitimate interest of **WEBEYE POLSKA Sp. Z.o.o.** to be able to meet the requirements of the GCT mentioned above, as the party contributing to the declaration.

Period of data processing

Data processing ends when the contact person's status ceases to exist or upon the lapse of the fifth year following the termination of the contract.

Data transfer

The transfer of your data may be executed towards WebEye Bulgaria OOD (Bulgaria, Sofia 1592 Sofia, 41 Nedelcho Bonchev str.)., cooperating in offering the service.

2. Cookie data processing

In the interest of a customised and efficient use of our website, as well as for a better user experience, our website may store small data packages, so-called cookies, on your computer. Cookies are identifiers that our website or its partner

server collecting the cookie may send to the computer used by you so as to identify the computer used while visiting our website and store the technical data on the use of the homepage (e.g. click-through, other navigation data).

According to their default configuration, most browsers automatically receive these cookies. The storing of cookies can be turned off; furthermore, it is also possible to set the browser to send a notification before a cookie is stored on your computer. These settings apply solely to the browser programme and the computer used; the settings and switching off of the cookies are to be configured by each computer and each browser, separately. By turning off the cookies, we cannot guarantee the appropriate operation of all the functions of the website and the best user experience.

3. Your rights related to data processing

Within your period of data processing, according to the requirements of GDPR, you have the following rights:

- access to personal data and information related to data processing,
- right to rectification
- restriction of data processing,
- right to erasure,
- right to portability,
- right to withdraw consent.

If you would like to exercise your rights, that involves your identification; furthermore, it is also necessary that we communicate with you. Therefore, in the interest of identification, it will be necessary that you provide personal data (however, identification may be based only on data that we otherwise already process on you); also, your complaint related to data processing will be accessible in our email account within the period specified in this Notice in connection with complaints.

We respond to complaints related to data processing within 30 days at the latest.

Right to withdraw consent

You have the right to withdraw the consent to data processing at any time; in this case, we erase the data provided from our systems. However, please be aware that if mediation is underway, we also have to notify our partner about the erasure of data, which will render mediation unsuccessful.

Access to personal data and information

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right to:

- obtain access to your personal data processed, and
- be informed about the following information:
    - the purposes of data processing;
    - the categories of the personal data processed on you;

- information on the recipients or categories of recipient to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- your right to request rectification or erasure of personal data or restriction of processing of personal data concerning you, or to object to such processing in the event of data processing based on legitimate interest;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from you, any available information as to their source;
- the existence of automated decision-making (where applicable), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

The purpose of exercising the right may be aimed at the establishment and control of the legitimacy of data processing, therefore, in the event of multiple requests for information, we may charge a fair reimbursement of costs for the performance of the request for information.

We secure access to personal data by sending you the personal data and information processed in email, following your identification.

Please indicate in your request whether you are requesting access to personal data or you are requesting the information related to data processing.

Right to rectification

You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you.

Right to restriction of processing

You have the right to obtain restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, in such case the restriction applies for the period that enables us to verify the accuracy of the personal data; if verification is not necessary, no restriction is applied either;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing indicated, but they are required by you for the establishment, exercise or defence of legal claims; or
- you objected to data processing, however, our legitimate interest may also substantiate the data processing; in which case, pending the verification whether our legitimate grounds override your legitimate grounds, data processing is to be restricted.

Where processing falls under restriction, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We inform you about the lifting of the restriction of data processing in advance (at least 3 working days before the restriction is lifted).

Right to erasure and right to be forgotten.

You have the right to obtain the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent and there are no other legal grounds for the processing;
- you object to data processing based on legitimate interest and there are no overriding legitimate grounds (that is, legitimate interest) for data processing,
- the data have been processed unlawfully, which was established on the basis of the complaint,
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.

If, on some legitimate grounds, we made personal data processed on you public, and we are obligated to erase that for any of the reasons indicated above, we, taking into consideration available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that you have requested the erasure of any links to, or copy or replication of, those personal data. As a rule, we do not make your personal data public.

Erasure cannot be applied in case data processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject or for the performance of a task carried out in the public interest (e.g. Where data processing is realised within the framework of invoicing, as preserving the invoice is required by law), or in the exercise of official authority vested in the controller;
- for the establishment, exercise or defence of legal claims (e.g.: if we have a claim outstanding towards you and that has not been performed yet, or the administration of a consumer or data processing complaint is underway).

Right to portability

If data processing is necessary for the performance of a contract, or data processing is based on your freely given consent, you have the right to receive the data you provided to us in a machine-readable format, which we will put at your disposal in xml, JSON or csv format, where technically feasible, you may request that the data be transmitted to other controllers in this format.

Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, based on legitimate grounds. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Possibilities for legal remedy

If, in your opinion, we violated some legal provision related to data processing, or failed to perform a request of yours, in the interest of the termination of alleged unlawful data processing, you may initiate an investigation by the Hungarian National Authority for Data Protection and Freedom of Information)(mailing address: 1530 Budapest, Pf.: 5., e-mail: ugyfelszolgalat@naih.hu).

4. Data Security

During the operation of IT systems, through the necessary authorisation, internal organisational and technical solutions we prevent unauthorised individuals from coming into possession of your data, from erasing the data, saving the data from the system or modifying them. We enforce the data protection and processing security requirements towards our processors as well.

We keep records of potential personal data breaches; if necessary, we inform you about any data breach that occurred, where required by GDPR.

5. Miscellaneous provisions

We reserve the right to modify this Data Processing Notice, in a manner not affecting the purpose and legal basis of data processing.

If, however, we intend to execute further data processing in connection with the data collected for a further purpose other than that of their collection, prior to the further data processing, we will inform you about the purpose of data processing and the following information:

- the period of storing the personal data, or, if this is not possible, the criteria of determining the period;
- your right to request access to and rectification or erasure of the personal data concerning you, or restriction of processing, and in the event of data processing with a legitimate interest, to object to processing of personal data; in the event of data processing based on consent or a contractual relationship, you may request that the right to the portability of data be secured;
- in case of data processing based on consent, you may withdraw the consent at any time,
- the right to lodge a complaint with a supervisory authority;
- whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obligated to provide the personal data and of the possible consequences of failure to provide such data;
- the existence of automated decision-making (where applicable), including profiling, and, at least in such cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Data processing can commence only after this; if the legal basis of data processing is consent, in addition to the information, you also have to consent to data processing.

The effective date of this Data Processing Notice is **15. September 2021.**

Wloczek Pawel

CEO

WEBEYE POLSKA Sp. Z.o.o.