

Personal data security policy

Legal basis

1. Personal data in KPT sp. z o.o. are processed with respect to the law regulations binding in respect thereof, and in particular:
 - 1) 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 (General Data Protection Regulation – hereinafter referred to as “RODO”)
 - 2) Act of 16 July 2004 – Telecommunication Law (Journal of Laws no. 171 item 1800 as amended),
 - 3) Act of 13 April 1993 on unfair competition (Journal of Laws no. 47 item 211 as amended);
 - 4) Art. 22 § 1 -5 of the Act of 26 June 1974 Labour Code (i.e. Journal of Laws of 1998 no. 21, item 94 as amended) and secondary legislation issued under this Act.
 - 5) Other terms of the Act and regulations standardizing processing of personal data of particular categories.
2. Personal data in KPT sp. z o.o. are processed in order to implement tasks. Personal data are processed in particular to
 - 1) Secure proper course of basic activity, implementation of other justified goals and tasks of KPT sp. z o.o.
 - 2) Ensure proper, lawful and compliant with the KPT sp. z o.o. goals personal policy, and current employment relationship management, and also other employment relationships established by KPT sp. z o.o.

Basic definitions

3. Terms used in the document shall be construed as follows:

- 1) **KPT sp. z o.o.** – Krakowski Park Technologiczny Limited Liability Company with its seat in Krakow.
- 2) **Personal Data Administrator (PDA)** – shall mean natural or legal person, public authority, unit or other entity, which independently or jointly determines goals and methods of personal data processing; if goals and methods of such processing are specified in the EU law or a EU member’s law, thus also in the EU law or a EU member’s law an administrator could be appointed or particular criteria of their appointment could be determined;
- 3) **Personal data** – information about identified or identifiable natural person (“a person the data pertain to”); an identifiable natural person is a person that can be directly or indirectly identified, in particular based on an identifier, like name and surname, identification number, location data, the Internet identifier, or one or

- more particular factors defining physical, physiological, genetic, mental, economic, cultural or social identity of a natural person;
- 4) **Data files** – shall mean an arranged set of personal data available according to determined criteria, regardless of whether the set is centralized, decentralized or distributed functionally or geographically;
 - 5) **Personal data processing** – shall mean an operation or a set of operations performed on personal data or sets of personal data in automatic or non-automatic way, like collection, recording, organizing, arrangement, storage, adapting or modifying, loading, browsing, using, disclosing by sending, distribution or other type of making available, matching or joining, limiting, removing or destroying;
 - 6) **IT system** – a set of cooperating devices, software, information processing procedures and software tools used to process the data;
 - 7) **Personal data protection** – implementation and exploitation of due technical and organizational means ensuring protection of data against unauthorized processing;
 - 1) **IT System Administrator (ITSA)** – an IT team responsible for security of personal data processed in IT systems, including in particular for preventing third party access to the systems and taking appropriate actions in case of detecting any disturbance in those systems;
 - 8) **KPT sp. z o.o. buildings** – a building of KPT Podole located in 60 Podole St in Krakow, and a building located in 14 prof. M. Życzkowskiego St in Krakow.

Personal Data Security Policy document implementation goal

4. The Board of KPT sp. z o.o. declares involvement in proper management of personal data security in KPT sp. z o.o.
5. The Board of KPT sp. z o.o. declares that they make every effort to ensure security of personal data.
6. Security shall mean factual background preventing accidental or illegal destruction, loss, modification, unlawful disclosure or unlawful access to personal data being sent, stored or otherwise processed.
7. This document has been made up to ensure security for personal data in KPT sp. z o.o. with particular consideration given to lawfulness.
8. The goal of the Personal Data Security Policy is to achieve and maintain an acceptable level of the KPT sp. z o.o. information assets by implementing an appropriate system of security for those assets against internal and external risks.
9. Another goal is raising the level of awareness of the KPT sp. z o.o. employees with regard to the meaning of personal data security.

Personal Data Security Policy document scope of application

10. Personal Data Security Policy shall be applied to any forms of information including personal data: paper documents, electronic and other records, being the property of KPT sp. z o.o. or administered by KPT sp. z o.o. and processed in the IT, traditional (paper) and communication systems of KPT sp. z o.o.
11. Personal Data Security Policy shall be applied to all the employees of KPT sp. z o.o., as well as to third persons having access to personal data in KPT sp. z o.o.

12. Personal data protection resulting from Personal Data Security Policy is implemented at every stage of information processing.

Personal data processing rules

13. Personal data shall be:

a) processed lawfully, honestly and clearly for a person, whom the data concern ("lawfulness, honesty and clarity");

b) collected with particular, clear and legally justified purposes and not processed further in a way incompliant with those purposes; further processing for archiving purposes in the public interest, for scientific or historical research, or for statistical purposes is not acknowledged pursuant to Art. 89 section 1 of RODO as incompliant with the original purposes ("purpose limitation");

c) appropriate, suitable and limited to the scope necessary for the purposes for which they are collected ("data minimization");

d) correct and, if necessary, updated; any reasonable action shall be taken to immediately remove or correct the personal data which would be incorrect in respect of the purposes of their processing ("correctness");

e) stored in a form enabling identification of a person the data pertain to, for a period not exceeding the period necessary for the purposes the data are processed for; personal data can be stored longer, if they are processed exclusively for archiving purposes in the public interest, for the purpose of scientific or historical research or for statistical purposes pursuant to Art. 89 section 1 of RODO, on the stipulation that appropriate technical and organizational means, required under this Regulation, would be introduced to protect the rights and liberties of the persons the data pertain to ("storage limitation");

f) processed in the way ensuring proper security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organizational means ("integrity and confidentiality").

Personal Data Security Inspector

14. The Board of KPT sp. z o.o. has appointed a Data Security Inspector. He is directly responsible to the Board. The Board of KPT sp. z o.o., assures that the Data Security Inspector would not receive instructions concerning any action to be performed at his post. He shall not be dismissed or punished for performing his tasks.

15. His tasks cover in particular:

a) informing the administrator and his employees of their obligations under the Regulation and other articles,

b) monitoring obeying the Regulation and other articles of the EU and member states and internal regulations of the administrator,

c) training of personnel taking part in personal data processing operations,

- d) performing regular audits in the organization,
 - e) providing the administrator with instructions in respect of introducing appropriate and effective technical and organizational means to protect the personal data and a method of demonstration of law abiding by the administrator, in particular in respect of identification of risk related to processing, its assessment of a source, nature, probability and significance of such risk, and the best practices to minimize the risk,
 - f) if requested, providing recommendations on the assessment of effects of personal data processing and monitoring the following of those recommendations,
 - g) cooperation with a supervision authority,
 - h) serving as a contact point for the supervision authority in respect of all the issues related to processing.
16. The persons the data pertain to, can contact the Data Security Inspector concerning any matters related to processing their personal data and to exercising of rights they have under RODO at the following address: iod@kpt.krakow.pl

Technical and organizational means essential for following the rules of personal data processing

17. The Personal Data Administrator is KPT sp. z o.o.
18. Management of personal data security is a constant process performed in cooperation between the users and the Data Security Inspector and the IT Systems Administrator.
19. In data processing KPT sp. z o.o. uses technical and organizational means ensuring data protection specified in Art. 32-36 of RODO, in particular ensures protection of integrity and confidentiality of personal data.
20. KPT sp. z o.o. implementing the security policy in respect of personal data protection, designates buildings, rooms and their parts, constituting the area of KPT sp. z o.o. where personal data are processed.
21. Access to the place where personal data are processed is secured by a system of access cards issued by KPT sp. z o.o.
22. The KPT sp. z o.o. buildings are protected by a professional entity. Furthermore, the KPT sp. z o.o. buildings are equipped with video-surveillance. Information concerning the use of video-surveillance is provided at:
- KPT Życzkowskiego building – on the main entrance door, facing the front of the building and facing the internal parking lot;
 - KPT Podole building – on the elevation of two garage platform buildings located at the front side of the building, on the left and right side of the staircase leading to the main entrance to the building; i.e. in the common area, visible for anyone entering the building.

Rights of persons whose data are processed by KPT sp. z o.o.

23. KPT sp. z o.o. assures natural persons, whose data are processed on account of current activity, of their rights guaranteed by binding law.

24. In particular, each natural person, whose data are processed on account of the KPT sp. z o.o. activity, is entitled to request of the Administrator the access to personal data pertaining this particular person, their correction, removal or limitation in processing, or is entitled to process and transfer of the data.

Consequences of violation of the Information Security Policy

25. Persons violating the rules of the Data Security Policy shall be rendered liable to prosecution under the terms of service (disciplinary or order) or criminal prosecution.

Final statements

26. Detailed rules of personal data processing are specified in the regulations of internal nature.