

Information clause for persons representing the company, its employees and collaborators in connection with the signing and performance of a contract

With a view to the provisions of the Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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) (OJ L 119, p. 1), hereinafter referred to as "GDPR", we wish to provide this information to:

- the persons representing the company whose data are included in the contract concluded with the controller and
- if you provide us with personal data of your staff, i.e. employees or collaborators for contact purposes and contract performance, we ask the representatives to provide them with the following information clause.

I. Personal data controller

The controller of your personal data is **Pathfinder23 spółka z ograniczoną odpowiedzialnością** with its registered seat in Warsaw, ul. Ząbkowska 31, 03-736 Warsaw, registered in the companies register maintained by the District Court for the capital city of Warsaw in Warsaw, XIV Commercial Division of the National Court Register, under KRS number: 0000689667, tax identification number NIP: 7010708448, statistical number REGON: 367979672, hereinafter referred to as the "**Controller**" or "**Pathfinder23**".

II. From whom do we receive your personal data?

Personal data of:

- persons who sign a contract with us (hereinafter "**Representatives**") - we may have obtained the data directly in the course of the contact, in connection with the efforts to conclude a contract between us, or indirectly as a person designated to represent the entity (e.g. as an entrepreneur, proxy, attorney, board member), or the data may have been taken from public registers (KRS, CEIDG), or from the website of the entity you represent;
- employees, collaborators or other persons designated to perform a contract or contact us (hereinafter "**Personnel**") - we may have acquired directly in connection with contact (e.g., by email, telephone) or indirectly from an entity with whom we have a contract and with whom you work or are an employee or with the assistance of other personnel or the website.

III. What data do we process?

The Controller may process the following categories of personal data, as applicable:

- name, surname, business e-mail address, telephone number, correspondence and signature.

IV. For what purpose do we process your data?

We process your data as a Representative for the following purposes:

- in connection with the contract, i.e. in seeking to enter into, amend, denounce, terminate, negotiate and sign it, as well as for the purpose of its performance and carrying out further cooperation between the parties (legal basis Article 6(1)(b) of the GDPR);
- to contact and know who is authorized (and to what extent) to represent the party, which is our legitimate interest (legal basis Article 6(1)(f) of the GDPR).

Additionally, we process your data as a Representative for the purposes of:

- contract management, sending correspondence, maintaining contact, which is a justified due to the cooperation between us (legal basis Article 6(1)(b) of the GDPR);
- possible: (a) enforcement of our obligations; (b) protection of our interests; (c) protection of our rights, privacy, security and property, as well as your or others rights, privacy, security and property; (d) enabling us to enforce all available legal remedies or to limit the damage that we may suffer and (e) establishment, exercise or defence of legal claims. All the activities will be carried out to the extent necessary for our purposes legitimate interests (legal basis Article 6(1)(f) of the GDPR);
- compliance with legal obligations arising in particular from tax and accounting law, as well as anti-money laundering and counter terrorist financing provisions (legal basis Article 6(1)(c) of the GDPR)

The use of personal data is necessary for the conclusion of the contract and its execution, without their receipt it would not be possible to sign and perform the contract.

V. Right to object and withdraw consent.

At any time you have the right to withdraw permission to the processing of your personal data described above. We will stop processing your data for the abovementioned purposes unless we can demonstrate that there are valid legitimate grounds for the processing of your personal data which prevail over your interest, rights and freedoms or your data will be necessary for us to potentially determine, investigate or defend against claims.

We do not plan to process your data on the basis of your consent. However, if you explicitly act and send us additional personal data for a specific purpose or if you voluntarily consent to the processing of your data with the consent specified therein, we would like to inform you that you can withdraw your consent at any time by writing to the Data Protection Officer appointed by us and that your withdrawal does not affect any previous data processing,

VI. Data storage period

Your personal data will be stored during the term of agreement and the period of limitation of claims, according to Article 118 of the Polish Civil Code (as a rule, not less than 6 years, in order to ensure the protection of the interest). Data of persons appointed for contact will be processed in accordance with the above unless we are given a prior notice about the termination of such person's cooperation with the contractor.

Accounting data will be stored for a period of 5 years from the year following the financial year, in which the operations and transactions have been finally completed, cleared or repaid.

If processing is necessary for us to comply with a legal obligation, the personal data will be processed for a period of time resulting from a commonly applicable provisions of law, in particular from tax law and accounting provisions.

If processing is necessary for the purposes of our legitimate interests, the personal data of Representatives and contractors' staff will be processed for a period of time no longer than it is necessary for the purposes for which they are processed or until raising an objection against the processing of personal data.

VII. Your rights and the Data Protection Officer.

In accordance with the provisions of GDPR and on the grounds indicated therein, you have:

- the right to access your data;
- the right to rectify (amend) your data;
- the right to erase your data and restrict its processing;
- the right to object to the processing of data;
- the right to data portability (where data is processed by automated means).

In this regard, you can contact the Data Protection Officer appointed by the Controller by writing to the e-mail address: ochronadanych@brandnewgalaxy.com or the the Administrator correspondence address with the reference "Data Protection Officer".

Furthermore, you have the right to lodge a complaint to the supervisory authority. The supervisory authority in Poland is the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.

VIII. Data recipients.

Your personal data may be disclosed to the entities and bodies authorized to process those data on the provisions of law (if necessary, e.g. in case of submitting explanations to a tax authority) or under the concluded data processing agreement (in the field of IT support, e-mail handling by Microsoft or other entities supporting the Controller), as well as to entities performing debt recovery and entities from our capital group. The transfer of your data to other entities from the same capital group as the Controller takes place on the basis of the Controller's legitimate interest, which is the global management of joint process (legal basis Article 6(1)(f) of the GDPR) due to the joint controllership agreement concluded with the following companies operating in the group:

- Assembly Poland spółka z ograniczoną odpowiedzialnością (KRS number: 0000757093);
- BNG Business Services spółka z ograniczoną odpowiedzialnością (KRS number: 0000268922);
- Berbenno spółka z ograniczoną odpowiedzialnością (KRS number: 0000957701);
- Spacecamp spółka z ograniczoną odpowiedzialnością (KRS number: 0000691123).

Your data will not always be transferred to other companies in the group, as it depends on the scope of services provided by the Controller.

Pathfinder23 is part of a capital group, which is characterised by having common administrative policies - i.e. human resources, finance, legal and IT - in order to share economic synergies and ensure security for the processing of personal data. The companies from the capital group are also linked by business contracts and the processing is a legitimate interest arising from the provision of contracted services and ownership control, in accordance with legislation and corporate governance.

Joint processing operations on personal data	Categories of personal data	Companies involved
Personnel and recruitment	Personnel data of employees, optionally of persons employed under civil law contracts and in the case of notifications, e.g. for insurance - of family members. Candidates' data.	The activity concerns all companies from the group and the main service is provided by BNG Business Services sp. z o.o.
Accounting	Financial data of employees, collaborators, contractors/customers, prize winners and others whose data will need to be accounted for.	The activity concerns all companies from the group and the main service is provided by BNG Business Services sp. z o.o.
Legal services	Data of employees, collaborators, contractors/clients, other persons whose data may be included in	The activity concerns all companies from the group and the main service

	contracts or other documents reviewed by the legal department.	is provided by BNG Business Services sp. z o.o.
Implementation of contracts with contractors/customers	Data received from counterparties/customers	Each company in the group has a separate service, but a joint service may be required, e.g. for HR, audits, IT.
DPO services	Employee data - for contact reasons and applicant data - for request reasons.	All companies from the group.
IT structure management	The above Personal Data located in shared IT resources, but with segregated access within the necessary knowledge.	IT infrastructure is shared by all companies from the group.

Each company from the group, as a joint controller, is obliged to communicate transparently, inform about the way in which personal data is processed, provide grounds for processing, including grounds for transfer outside the EEA, adequately authorise and organise training for its employees and collaborators, and oblige them to confidentiality, as well as inform them about possible data breaches.

IX. Data transfer to third countries, i.e. outside the European Economic Area.

Due to the fact that the Controller cooperates with foreign entities supporting its organization management processes, it may happen that your basic personal contact information (e.g. name, surname, business e-mail address and company data) will be provided to an entity located outside the European Economic Area. The Controller only selects entities that meet the requirements of Chapter V of the GDPR, i.e. they process data by entities whose seat is located in a country in whose respect the Commission has decided that it ensures an adequate level of protection of personal data in that third country, legalizing the transfer of data outside the EEA, or standard contractual clauses (so-called SCC) have been concluded with that entity, or in exceptional situations we use the grounds under Article 49(1) GDPR, because the data may be necessary for the performance of a contract or we rely on your explicit consent, in relation to the purpose indicated in its content.