



# Privacy Policy

## GENERAL ASSUMPTIONS

ICPT takes special care to protect your interests and, in particular, ensures that Personal Data collected by ICPT is: (i) processed lawfully; (ii) collected for specified, legitimate purposes and not further processed in a way incompatible with those purposes; (iii) substantively correct and adequate in relation to the purposes for which they are processed; and (iv) kept in a form that permits identification of data subjects for no longer than is necessary to achieve the purpose of the processing.

## DEFINITIONS

The capitalized terms in this Policy shall have the following meanings:

- 1) **Cookies** - means text/number files stored by your web browser on the disk of your computer or other device for the purpose of storing information for your identification or remembering the history of actions taken by you on the ICPT website;
- 2) **Personal Information** - means any information about an identified or identifiable natural person e.g. name, location data, internet identifier, terminal device, contact details, job title, data indicated during recruitment;
- 3) **ICPT** - means Impact Clean Power Technology Spółka Akcyjna with its registered office in Warsaw, address: 00-116 Warsaw, ul. Świętokrzyska 30/63, address of the Management Office (for correspondence): Al. Jerozolimskie 424A, 05-800 Pruszków, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Division of the National Court Register, under KRS number: 0000378990, NIP: 525-250-10-81, REGON: 142846310
- 4) **Policy** - means this document;
- 5) **GDPR** - means 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).

## PROCESSING OF PERSONAL DATA

1. The ICPT processes different Personal Data depending on the tool used:

TOOL	PURPOSE	SCOPE OF DATA	LEGAL GROUNDS	DATA RETENTION PERIOD
ICPT website contact form	Answering a question submitted via the contact form and communication in that regard	Name, email address and other contact details provided on the contact form and details of the case	Legitimate interest (Article 6 sec. 1 (f) of the GDPR) in providing contact with ICPT customers.	For the period necessary to clarify the matter in connection with the receipt of an inquiry via the contact form.
CRM Software	Manage customer base and improve customer relations	Name, e-mail address, telephone number, official position, name of cooperating entity	Legitimate interest (Article 6 sec. 1 (f) of the GDPR) to manage the customer base and improve customer relations.	Until the customer's agreement termination date.
E-mail	E-mail communication with customers and suppliers	Name, contact details, official position, name of cooperating entity, IP address, name/type of terminal device	Legitimate interest (Article 6 sec. 1 (f) of the GDPR) consisting in the performance of contracts to which your employer or an entity cooperating with you is a party.	For as long as necessary until the expiration of the statute's limitation period for claims to which ICPT is entitled as well as those asserted against ICPT.

	E-mail communication with prospects	Name, contact information, official position, name of cooperating entity.	Legitimate interest (Article 6 sec. 1 (f) of the GDPR) to enter into and conduct discussions/negotiations with your employer or business associate with a view to ICPT engaging with that business associate.	For as long as necessary until the expiration of the statute's limitation period for claims to which ICPT is entitled as well as those asserted against ICPT.
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2. ICPT processes Personal Data in connection with the performance and settlement of agreements concluded with contractors on the following principles:
  - 1) The purpose of the processing of Personal Data is the due performance of an agreement, the performance of public law obligations (e.g. tax, accounting), the settlement of an agreement (e.g. the issuance of an invoice), the collection of debts by way of court or enforcement, the defence against claims arising from the non-performance or improper performance of agreements.
  - 2) ICPT processes the following Personal Data processed for the above purposes: name and surname, contact details, official position, name of the contractor.
  - 3) ICPT processes Personal Data on the basis of:
    - a) Article 6 sec. 1 (f) of the GDPR, i.e. legitimate interest consisting in: (i) the ongoing performance of the contract and contacting the contractor, (ii) the collection of debts by way of court or enforcement, (iii) defence against claims arising from the non-performance or improper performance of contracts;
    - b) Article 6 sec. 1 (c) of the GDPR, i.e. fulfilment of a legal obligation consisting in the performance of public law obligations (e.g. tax, accounting) and settling the contract (e.g. issuing an invoice)
  - 4) Personal Data are processed:
    - a) for the period necessary until the expiration of the statute's limitation period for claims to which ICPT is entitled as well as asserted against ICPT - in the case of processing of Personal Data on the basis of Article 6 sec. 1 (f) of the GDPR;
    - b) for the period necessary until the expiration of the statute's limitation period for ICPT's tax or accounting liabilities - where Personal Data is processed pursuant to Article 6 sec. 1 (c) of the GDPR
3. ICPT processes Personal Data in connection with your inquiries, requests, demands, and complaints to ICPT regarding the processing of Personal Data, use of the Website, or ICPT's business on the following principles:
  - 1) the purpose of the processing is to respond to inquiries and to process requests, demands, or complaints;
  - 2) ICPT processes the following Personal Data for the above purpose: name, contact details, content, other data provided by you;
  - 3) ICPT processes Personal Data on the basis of:
    - a) Article 6 sec. 1 (f) of the GDPR, i.e. a legitimate interest to increase the quality of the products or services provided or to improve the functionality of the services provided electronically;
    - b) Article 6 sec. 1 (c) of the GDPR, i.e. fulfilment of a legal obligation to provide the data subject with information on actions taken in connection with a request, demand or complaint.
  - 4) Personal Data shall be processed:

- a) for the period necessary to respond to the request - in the case of processing of Personal Data pursuant to Article 6 sec. (f) of the GDPR;
  - b) for the period necessary for the final consideration of the request, demand or complaint - in case of processing of Personal Data pursuant to Article 6 sec. (c) of the GDPR;
  - c) for the period necessary for the expiration of the statute's limitation period for claims asserted against the ICPT - where Personal Data is processed pursuant to Article 6 sec. (c) of the GDPR.
4. ICPT does not perform operations on Personal Data leading to a decision that is based solely on automated processing, including profiling (Article 22 GDPR).

## COOKIES

1. ICPT uses two types of Cookies:
  - 1) session - temporary files that remain on your device until you log out of the website or close your browser.
  - 2) permanent - files that remain in the memory of your device for the time specified in their parameters or until they are manually deleted.
2. ICPT uses cookies in order to correctly configure the website and to carry out processes necessary for its full functionality - so-called essential cookies, which are always active and your consent to their installation is not required;
3. By means of cookies, the ICPT processes Personal Data related to your device, including device ID, MAC address, IP address, operating system, device settings, in particular language settings, screen resolution, browser type.
4. You have the ability to manage Cookies using your browser settings. In particular, you can change the settings of Cookies by modifying the settings of your web browser, where in the security settings you can independently allow or block temporary and permanently stored Cookies; detailed information on the possibility and methods of handling Cookies are available in the Help tab in the menu of each browser.
5. Deactivation of Cookies may result in some functionality on the ICPT website being unavailable and some sub-pages being displayed incorrectly.

## YOUR RIGHTS

1. You have the right to lodge a complaint with a supervisory authority in relation to the processing of Personal Data by ICPT. At the same time, you can contact ICPT on all issues related to the processing of Personal Data at: [rodo@icpt.pl](mailto:rodo@icpt.pl).
2. Notwithstanding the above, you have a number of rights under the GDPR relating to the processing of Personal Data. Your rights include:

Type of right / request	Content of the right/ request	Effects of exercising a right / demand	Legal grounds
Right to withdraw consent to the processing of Personal Data	If the processing of Personal Data by ICPT is based on your consent, you have the right to withdraw the consent you have given	Withdrawal of consent shall be effective only for the future and shall not affect the lawfulness of processing by ICPT of Personal Data before its withdrawal.	Art. 7 sec. 3 of the GDPR
Right of Access to Personal Data	You have the right to confirm whether ICPT processes your Personal Data. If ICPT processes your Personal Data, you have the right to obtain access to your Personal Data and, <i>inter alia</i> , the following information: 1) the purposes of the processing; 2) the categories of Personal Data concerned; 3) information about the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, in particular recipients in third countries or international organizations; 4) where possible, the intended period of retention of the Personal Data, and, if that is not possible, the criteria for determining that period; 5) information about your rights and claims under the GDPR.	ICPT will provide information as to whether Personal Data is being processed and, upon request, will provide additional information to the extent indicated in the adjacent column.	Art. 15 sec. 1 of the GDPR
Right to obtain a copy of your Personal Data	You have the right to request a copy of your Personal Data, in particular to have it delivered electronically.	ICPT will provide you with a copy of your Personal Data. For any subsequent copies you request, ICPT may charge a reasonable fee based on	Art. 15 sec. 3 of the GDPR

		administrative costs. If you request a copy electronically, and unless you indicate otherwise, ICPT will provide you with the information in a commonly used electronic form.	
Right to erasure of Personal Data	If: 1) you have withdrawn your consent to the processing of Personal Data 2) you believe that the Personal Data is no longer necessary to ICPT for the purposes for which it was collected or for which it was processed; 3) you have objected to the processing of Personal Data based on a legitimate interest and the objection is found to be valid; 4) you believe that the Personal Data is being processed unlawfully, you have the right to demand erasure of all or some of your Personal Data	ICPT will erase Personal Data to the fullest extent consistent with your request, but may retain certain Personal Data to the extent necessary for purposes of establishing, investigating or defending against claims	Art. 17 of the GDPR
Right to restriction of processing of Personal Data	You have the right to request restriction of the processing of Personal Data if: 1) you question the accuracy of the Personal Data 2) you believe that the processing of your Personal Data is unlawful, but you object to the erasure of your Personal Data, requesting instead that its use be restricted	Where referred to in point 1), the ICPT will limit the processing of Personal Data for a period allowing the ICPT to check the accuracy of the data In the case referred to in point 4), the ICPT will limit the processing of Personal Data until such time as it determines that the ICPT's legitimate	Art. 18 of the GDPR



	<p>3) you believe that the Personal Data is no longer necessary for ICPT's processing purposes, but is needed by you for the establishment, investigation, or defence against claims</p> <p>4) you have objected to the use of the Personal Data</p>	grounds for objecting outweigh the grounds for your objection	
Right to Personal Data portability	<p>In relation to Personal Data processed on the basis of consent pursuant to Article 6 sec. 1 (a) of the GDPR or on the basis of a contract pursuant to Article 6 sec. 1 (b) of the GDPR, you have the right:</p> <p>1) receive your Personal Data that you have provided to ICPT;</p> <p>2) request that the Personal Data be sent by ICPT directly to another controller, where technically possible.</p>	ICPT will release your Personal Data to you in .csv or other format appropriate to the type of Personal Data set.	Art. 20 of the GDPR
Right to object to the processing of Personal Data on the basis of legitimate interests	<p>If the processing of your Personal Data by ICPT is carried out on the basis of a legitimate interest (Article 6 sec. 1 (f) GDPR), you have the right to object to the processing of your data at any time.</p>	<p>The ICPT will examine the grounds for objection you have provided and will cease to process your Personal Data. The controller will no longer be allowed to process your Personal Data if the examination does not reveal the existence of valid legitimate grounds for the processing which override your interests, your rights and freedoms, or grounds for the establishment, exercise or defence of claims</p>	Art. 21 of the GDPR

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