

“Personal Data Processing Notice”

1. Data Controller and Data Protection Officer

The Personal Data Controller is Inelo Polska Sp. z o.o. with its registered seat in Bielsko-Biała 43–300, ul. Karpacka 24/U2b (hereinafter referred to as INELO). You can reach INELO's Data Protection Officer via e-mail at iod@inelo.pl.

2. Categories of personal data being processed, purpose and legal basis

Your personal data, including, but not limited to company name, Tax Identification Number [Numer Identyfikacji Podatkowej, NIP], name and surname, e-mail address, telephone number, will be processed for commercial and marketing purposes, including direct marketing – according to Recital 47 of the GDPR (for this purpose we can contact you using the contact information that you provided). If any claims arise, the purpose of the data processing can include the establishment, enforcement and defense of potential claims. INELO will also process non-personal data, i.e. number of drivers, vehicles, type of transport, other additional information you provided voluntarily.

The legal basis for data processing is the legitimate interest pursued by the Data Controller, i.e. Article 6(1) (f) of the 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 of the European Parliament and the Council,) hereinafter referred to as the “GDPR”. Pursuant to the provisions of Article 21 of the GDPR, if data processing is based on grounds of legitimate interest pursued by the Data Controllers, the data subject has the right to object, at any time to the processing of their personal data – on grounds relating to their particular situation. The legal basis for processing your personal data is also Article 6(1)(a) of the GDPR (your consent to data processing for commercial and marketing purposes granted to entities from the Eurowag Group). The consent given is voluntary and you can withdraw it at any moment, however, it does not affect the lawfulness of processing before its withdrawal.

3. Source of personal data

INELO obtained your personal data from Eurowag Group entities (https://uploads-ssl.webflow.com/640885a438a8cac228718a04/644ad81bc9d8840d409477ea_Eurowag_Group_EN_200423.pdf), which received your consent for personal data processing for commercial and marketing purposes. INELO may contact you in order to prepare and send personalized offers and inform about news and updates regarding the Eurowag Group. The process may include, but not be limited to analyzing your personal data, assessing your needs and providing the most appropriate offer for INELO's product or service, as well as informing about new products and services, planned projects or other important events. Contact may be established via electronic messages, such as e-mails, text messages, mobile apps (including our own apps, as well as third-party apps, such as instant messengers/social media portals), messages conveyed through the Customer portal, phone calls, websites operated by INELO, traditional mail and/or in person by sales representatives. You can withdraw your consent by using the “cancel subscription” option included in marketing e-mails or using any of the other methods described in INELO's Privacy Policies.

4. Personal data transfers

Recipients of your personal data may include our vendors, who will be commissioned with providing services related to personal data processing, e.g. IT vendors (server vendor, vendor providing technical support for the software that stores personal data). They process data on the basis of an agreement and only according to our instructions. Should any claims arise, personal data may be transferred to entities providing legal assistance.

5. Retention period

Your personal data will be deleted if personal data retention will no longer be necessary for pursuing the goals for which it was collected or if the periods of limitation for claims have expired.

6. Rights under the GDPR

Each data subject whose personal data is processed has the right to request:

- a) access to their data (a data subject has the right to know what data is being processed by the Data Controller, how and for what purpose);
- b) rectification of their data (a data subject may request correction of inaccurate data or supplementation of missing data);
- c) erasure of their data (if one of the premises resulting from Article 17(1) of the GDPR is fulfilled; premises preventing the fulfillment of a data erasure request are listed under Article 17(3) of the GDPR);
- d) restriction of processing (a data subject may request restriction of processing. Where this request is justified, the Data Controller may process data within the scope of its retention, while simultaneously complying with the provisions of Article 18(2) of the GDPR);
- e) right to data portability (this right may be enforceable when consent of the data subject constitutes the legal basis for processing or when the legal basis relies on performance of a contract that is fully automated);
- f) right to object (after receiving such a request, the Data Controller ceases processing of the personal data covered by the objection, unless the Controller demonstrates compelling legitimate grounds for the processing that override the requestor's interests, rights and freedoms or their grounds for the establishment, enforcement or defense of legal claims);
- g) right to withdraw consent at any time without affecting the lawfulness of processing (if processing occurs on the basis of consent) based on consent before its withdrawal.

Data subjects may exercise the above-mentioned rights by submitting an application using the contact details provided under item 1. The Controller shall provide information about the measures taken in regard to the exercise of the above-mentioned rights to the data subject without undue delay and in any event within one month of receipt of the request.

Each data subject shall have the right to file a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych) in Warsaw, should they deem that the processing of their personal data infringes on the provisions of law.

7. Automated decision making/profiling

Personal data shall not be processed in a manner that would lead to automated decision-making, including profiling. This means that we do not use computer systems that would collect your information and would also automatically make independent decisions that could give rise to any legal consequences for you or that could significantly impact you in a similar manner. However, entities from the Eurowag Group may use such processing mechanisms, which they will communicate in their own privacy policies.

8. Data transfers to third countries

Personal data shall not be transferred to third countries and/or international organizations.

9. Obligatory or voluntary data processing

Personal data processing is voluntary, while at the same time failure to provide the data will prevent you from using the service (due to the legitimate interest of the Data Controller).

10. Further information

Additional information on how we process your personal data is available at <https://inelo.pl/informacje-o-rodo/> and <https://inelo.pl/polityka-prywatnosci-2/>.