

PRIVACY POLICY

About us

Waryński S.A. Grupa Holdingowa with its registered office in Warsaw at ul. Jana Kazimierza 3, 01-248 Warszawa, hereinafter referred to as the "Company" in this Privacy Policy, informs you that personal data are collected and processed in the manner and under the rules specified in herein. For more information, please visit iod@warynski.pl.

General provisions

In our Company, we pay special attention to protecting the privacy of our customers, contractors and employees. Therefore, it is of paramount importance to protect the rights and freedoms of individuals with regard to the processing of their personal data

We make sure that the processing of your data complies with the provisions of the General Data Protection Regulation 2016/679/EC (hereinafter referred to as "GDPR"), the Personal Data Protection Act, as well as specific provisions (contained, among others, in the Labour Law or the Accounting Act).

The Company is the controller of personal data within the meaning of Article 4 item 7 of the GDPR, we also use the services of the processing entities referred to in Article 4 item 8 of GDPR - they process personal data on behalf of the administrator (e.g. accounting and IT companies).

We implement appropriate technical and organisational measures to ensure a degree of security appropriate to the possible risk of infringement of the rights or freedoms of individuals of varying probability and seriousness. We also develop policies and procedures, as well as organise regular training sessions to improve the knowledge and competence of our employees in this area.

What we use your personal data for

As an employer, we process the data of employees and persons who cooperate with us on a basis other than an employment relationship. Contact details obtained from contractors (e.g. their employees) are used for concluding and smoothly executing contracts. We also process the data of those who have contacted us to respond to your inquiries or to handle your requests.

We share your data with third parties with your consent or when we are obliged to do so by law.

Under what circumstances and on what basis we process your data

We take great care to protect the interests of the data subjects, and in particular we ensure that the data are:

- processed lawfully, fairly and transparently for the data subject;
- collected for specific, explicit and legitimate purposes and not further processed in a way incompatible with those purposes;
- adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- correct and, where necessary, kept up to date; we shall take steps to ensure that personal data which are inaccurate in the light of the purposes of their processing are deleted or rectified immediately;
- maintained in a form which permits identification of the data subject for no longer than is necessary for the purposes;
- processed in a way that ensures adequate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction.

We usually process your data on the basis of your consent, which can be withdrawn at any time. Additionally, your data may be necessary to perform a contract, to which you are a party, or to take action at your request, even before the contract is concluded.

In some situations, processing is necessary to fulfil our legal obligation as the controller. Such obligations arise, for example, from the provisions of labour law or the Accounting Act.

Processing may also be necessary for the purposes of our legitimate interests, as exemplified by the recovery of claims from our business activities.

Your rights

We take appropriate measures to provide you with all relevant information and to communicate with you on the processing of your personal data in a concise, transparent, understandable and easily accessible form, in clear and simple language:

- information provided when collecting personal data,
- the information to be provided on request on whether or not data are processed and other matters referred to in Article 15 of the PDA, including the right to a copy,
- correct the data;

- to be forgotten;
- to limit processing;
- to transfer data;
- to object;
- not to be subject to a decision based solely on automated processing (including profiling),
- information about a breach of the personal data protection.

In order to contact us regarding the implementation of a given right, send a message to ido@warynski.pl

How we will contact you

We provide information in writing or otherwise, including, where appropriate, electronically. Should you so request, we may provide information orally, if we can confirm your identity by other means. If you transmit your request electronically, the information will also be transmitted electronically as far as possible, unless you indicate another preferred form of communication.

How soon we can fulfil your request

We try to provide information without undue delay - as a rule, within one month of receiving the request. If necessary, this period will be extended by a further two months due to the complexity of the request or the number of requests. However, in any event, within one month of receipt of the request, we will inform you of the action taken and (where applicable) of the extension of the deadline, giving the reason for such delay.

Subcontractors/processors

If we cooperate with entities that process personal data on our behalf, we only use the services of such processing entities that provide sufficient guarantees of implementing appropriate technical and organisational measures to ensure that the processing meets the requirements of the GDPR and protects the rights of the data subjects.

We check in detail the entities to which we entrust the processing of your data. We enter into specific agreements with them, as well as periodically check the compliance of processing operations with the content of such agreements and legal regulations.

How ensure that your data is processed properly

In order to meet the requirements of the law, we have developed detailed procedures covering such issues as

- data protection in the design phase and default data protection,

- data protection impact assessment,
- notification of infringements,
- making a register of data processing activities,
- data retention,
- the exercise of the rights of data subjects.

We regularly check and update our documentation in order to be able to demonstrate compliance with legal requirements in accordance with the principle of accountability formed in the GDPR, but also in the interests of the data subjects, we try to incorporate best market practices.

Data retention

We keep personal data in a form which permits identification of the data subject for no longer than is necessary for the purposes for which the data are processed. After such a period of time, we either anonymise (deprive the data of its characteristics allowing to identify a person concerned) or delete it. The deletion of personal data is complete and permanent. In the retention procedure we provide:

- limiting the period of the storage of personal data to a strict minimum,
- setting a time limit for the deletion of personal data and the criteria for setting that time limit or periodic review.

The period of data processing is primarily determined by legal regulations (e.g. time of storage of employee records, accounting documents), as well as the legitimate interest of the administrator (e.g. marketing activities). The retention policy covers both processed data in paper and electronic form.

Authorisations

We ensure that anyone acting under our authority and having access to your personal data will only process your data on our instruction, unless other requirements arise under Union or Member State law.