

PN_SOCIAL_MEDIA

Version 1 18.09.2023

PRIVACY NOTICE – SOCIAL MEDIA PRESENCE OF BASE GROUP

Dear Visitor, in accordance with Art. 13 of the General Data Protection Regulation (GDPR) we would like to inform you about the usage and processing of your personal data with regard to our social media presence. This Social Media Presence Privacy Notice explains how we collect, use and store your Personal Data through the official social media channels operated by Base Group. Base Group maintains publicly accessible profiles in several social media platforms. If you visit one of our social media profiles or pages, your Personal Data is processed by both the social media operator and by us. As both Base Group and the social media operator are separate Data Controllers, we have no influence on the data processing activities conducted by the social media operator. For such details, you can refer to the Terms of Use and Privacy Policy of the respective social media operator.

1. Base Group operates on several platforms including but not limited to the following:

<https://youtube.com/user/BaseGroupKoszwały>

<https://www.facebook.com/BaseGroupKoszwały>

https://www.instagram.com/base_group.pl

<https://www.linkedin.com/company/basemetal>

Controller of personal data processed when you visit or interact with these profiles is Base Group Sp. z o.o. with its registered office in Koszwały (83-020) Poland, ul. Spacerowa 29, National Court Register No 0000249201 (hereinafter “Data Controller” or “Base Group”).

2. We have appointed a **Data Protection Officer** (“DPO”) whom you may contact in all matters related to the processing of your personal data using e-mail: odo@base.pl.

3. Purpose and legal basis for personal data processing is pursuit of legitimate interests of Base Group - effective public relations, interaction and exchange with the users of our profiles, answering questions and providing relevant information, monitoring of the quality of service and effectiveness of social media presence including analysis of information about visitors, marketing of our services (Article 6 (1)(f) of the GDPR);

4. Where necessary, the recipients of your personal data may include:

4.1. authorized employees and associates of Base Group within the scope of internal structure

4.2. entities that process personal data on behalf of Base Group, in particular entities providing and maintaining software that we use as part of our current operations and providers of marketing services and platforms

4.3. entities duly authorized to obtain data under universally applicable provisions of law.

The recipients of the data may also be other users who visit our profiles and can read the comments or photos that you share. In addition, data is available to our Joint Controllers (see below for details).

5. Any activity that leaves your personal data on our profile is completely voluntary. You also decide what personal data we have access to by applying appropriate privacy settings.

6. The period of processing of your data depends on the purpose for which the data is processed:

6.1. data processed as part of our pursuit of legitimate interests are processed until right to object is exercised or until we determine that data became outdated or the purpose of processing has ceased;

6.2. Statistical and analytical data available through the functions offered on a given social media platform will be processed for the time of availability of such data in accordance with retention policy of the Joint Controller.

7. You have the right to access your data and obtain copy of it, the right to request that they be rectified or erased, the right to restrict their processing, right to data portability and right to object at any time to the processing insofar



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as the basis for the processing is our legitimate interest. You are entitled to these rights in the scope provided for in generally applicable provisions of law.

8. You have the right to lodge a complaint with the supervisory authority in charge of personal data protection in the Member State of your habitual residence, place of work, or place of the alleged infringement if the processing violates personal data protection laws. In Poland supervisory authority is President of the Personal Data Protection Office Stawki 2, 00-193 Warsaw (<https://uodo.gov.pl>).

9. As part of our administration of a given profile, we may use profiling tools such as Meta Pixels or Google Analytics to provide personalized information or advertising as part of the promotion of our own products and services and the analysis of traffic and behavior.

10. The joint controllers of your data, depending on the service and its functionality, are:

10.1. in case of Facebook, Messenger, Instagram - Meta Platforms Ireland Limited (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, the rules for the processing of personal data within the above-mentioned products and functions offered by Meta can be found in Privacy Policy available at: <https://www.facebook.com/privacy/explanation>;

10.2. in case of LinkedIn – LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, which processes personal data on the terms set out in Privacy Policy available on the <https://www.linkedin.com/legal/privacy-policy> website;

10.3. in case of YouTube - Google Ireland Gordon House, Barrow Street, Dublin 4, Ireland), which processes personal data on the terms set out in Privacy Policy available on the <https://policies.google.com/privacy> website. Each of co-controllers decides purposes and means of data processing, but to a different extent. The scope of responsibility of Base Group for data processing: having a legal basis for data processing for the needs of m.in statistics, fulfilling information obligations in the scope of the purposes of processing.

11. We do not transfer personal data outside the European Economic Area as part of our processing. However our Joint Controllers may transfer data outside the EEA. The transfer of data to countries outside the EEA is carried out using standard contractual clauses approved by the European Commission or decisions of the European Commission stating an adequate level of data protection for specific countries in accordance with the principles set out by Joint Controllers in their Privacy Policies.



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