

PRIVACY POLICY OF BASE GROUP SP. Z O. O.

We are pleased about your visit to our website. We would like to inform you about how we handle your personal data under 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 (GDPR).

This Privacy Policy sets out how we process your personal data and what rights you have in connection with their processing. We make every effort to ensure that your data is secure, paying particular attention to privacy of users visiting our websites. We use appropriate tools and technical solutions to protect your personal data against accidental, unlawful destruction, loss, unauthorized disclosure or access. We may make changes to this Policy, so please check it from time to time.

Detailed information under art. 13 sec. 1 and sec. 2 of the GDPR on the scope of data processing of individual categories of persons is specified in Privacy Notices available at basemetal.eu/GDPR.

DATA CONTROLLER

Data Controller of your personal data 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 referred to as "Data Controller" or "Base Group").

DATA PROTECTION OFFICER

Base Group appointed Data Protection Officer whom you can be contacted via e-mail odo@base.pl in all matters relating to the processing of personal data.

HOW AND WHAT PERSONAL DATA DO WE COLLECT AND PROCESS

Base Group collects personal data directly from you, e.g. when you use our website: information about the device (e.g. computer or mobile phone IP) you use to access our website. You can decide about the storage of cookies yourself by changing the settings in your browser. If you disable cookies, you may not be able to use all parts of our website. Detailed information on the Cookie Policy can be found at the very bottom of this document.

If you interact with us on social media and communication services such as Facebook, Instagram, LinkedIn, YouTube, we may have access to personal data from these accounts. The data we access



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through social networks will vary, but we will always comply with the terms and conditions of the respective service.

Base Group may also use personal data from publicly available sources, such as public service or information published in the media, as well as those that are commercially available as part of a third-party subscription.

ON WHAT LEGAL BASIS DO WE PROCESS PERSONAL DATA

We always make sure that we have a lawful basis for processing your personal data. The legal bases we may use depending on the purpose and how we use your personal data are:

1. consent granted pursuant to Article 6(1)(a) of the GDPR;
2. necessity for the performance of a contract or necessity to take steps at your request prior to the conclusion of a contract based on Art. 6 para. 1 lit. b) GDPR;
3. necessity to comply with a legal obligation of the data controller pursuant to Article 6(1)(c) of the GDPR;
4. necessity for purposes resulting from the legitimate interests pursued by Base Group based on Article 6(1)(f) of the GDPR;
5. necessity for purposes resulting from legitimate interests pursued by a third party based on Article 6(1)(f) of the GDPR.

PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA

The purposes for which we process your personal data are specified in detail each time in Privacy Notice regarding a given method of personal data processing, available at basemetal.eu/GDPR.

Most often, we will process data for one of the following purposes:

- a) offering our products and services by us (direct marketing) (legal basis Article 6(1)(f) of the GDPR)
- b) handling orders, payments, requests, complaints in connection with contracts concluded with us and orders placed (legal basis Article 6(1)(b) of the GDPR);
- c) performance of statutory requirements imposed on us resulting in particular from tax and accounting regulations (legal basis Article 6(1)(c) of the GDPR);
- d) transfer of data to forwarding companies in order to deliver the ordered goods to the selected carrier or intermediary performing shipments at the request of the Administrator (legal basis Article 6(1)(b) of the GDPR);
- e) contact to the indicated telephone number to answer inquiries (legal basis Article 6(1)(f) of the GDPR- legitimate interest);



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f) pursuing claims for our business activity (legal basis Article 6(1)(f) of the GDPR, legitimate interest which is the pursuit of our claims and defense of our rights).

HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA

The transmission of information over the Internet is never completely secure, but we do our best to protect your personal data. Once we receive personal data, we make every effort to ensure its security both in our systems and during transport between our systems and our partners who work on our behalf. All employees who have access to your personal data understand the importance of keeping your information secure at all times, are required to comply with our internal privacy and security policy and receive training in this regard.

We are however not responsible for the privacy policies and practices of other websites data controllers or joint controllers, even if you access them via links from our websites (for example in management of recruitment process based on data sent to www.basemetal.eu/praca in which we use software provided by Elevato Sp. z o. o., namely elevatosoftware.com) and we recommend that you check the policies of each website you visit.

HOW LONG DOES BASE GROUP KEEP PERSONAL DATA

The period of processing your personal data depends on the purpose for which they were collected and are processed. The period for which your data will be processed is calculated based on the following criteria:

1. marketing – based on receiving information about the withdrawal of consent or a request to cease data processing for marketing purposes;
2. consent - the period for which consent was granted;
3. legal duties - legal provisions that may oblige Base Group to process data for a certain period of time (e.g. evidence of accounting payments – 5 years from the end of the tax period, Labor Code – keeping personal files; Civil Code – limitation of claims);
4. pursuit of Base Group legitimate interests - the period necessary to protect the interests of Base Group (e.g. securing possible claims – until these claims are time-barred in accordance with the deadlines specified in the regulations);
5. in the case of handling inquiries - a period of 3 years in relation to the handling of inquiries and other requests addressed to us, including ensuring the accountability of the activities carried out;
6. in the case of recruitment - the duration of the recruitment process and with a separate consent for subsequent recruitments for a period of 2 years.

SHARING OF PERSONAL DATA



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We may share your personal information with partners, associates, agents or service providers to enable them to perform services on our behalf or to help us better understand our supporters/individuals interested in Base Group's activities. These partners will only act in accordance with our instructions and will not use your personal data for their own purposes. We always sign contracts with our suppliers that require them to comply with data protection laws and to have systems and processes in place to protect the security of personal data. We may share your email address or mobile number with digital advertising or social media companies that act on our behalf. This allows us to reach you and others with similar interests with the latest news and information from the life of the Base Group.

Your personal data may also be made available to other entities cooperating with us, in particular suppliers of IT systems and IT services and service providers supplying us with technical, IT and organizational solutions, enabling us to conduct business activity, including our websites and electronic services provided through them (in particular to suppliers of computer software to operate our services, email and hosting providers and business management and support software providers, service providers and customer service providers, selected carriers or agents performing shipments on our behalf, as well as financial institutions for direct debit execution and electronic payment or card payment processors, providers of the system of opinion surveys, providers of recruitment systems, providers of accounting, legal and advisory services providing the Administrator with accounting, legal or advisory support (in particular accounting offices, law firms or debt collection companies), suppliers of social plugins, scripts and tools enabling the integration of the website and services provided through it with services electronic external social networking sites, as well as providers of systems for automating the newsletter service – on the basis of commissioned services, whereby such entities process personal data in accordance with concluded contracts for entrusting the processing of personal data and only in accordance with our instructions.

In addition, in some situations, Base Group uses suppliers who do not act solely on the instructions of the data controller and determine the purposes and means of using Users' personal data themselves, being independent controllers of your personal data. In this case, the scope of processing your personal data is specified in the relevant documents of these entities (e.g. Privacy Policy, Terms of Service, Privacy Notices).

YOUR RIGHTS REGARDING PERSONAL DATA PROCESSING

On the terms set out in the GDPR and within the limits resulting from the regulations, you have the right to:

1. request access to personal data concerning you
2. request rectification of data
3. request supplementation of incomplete personal data
4. request that we delete data or limit processing
5. object to further processing of your personal data
6. request transfer of your personal data
7. obtain a copy of your data



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8. object to the processing insofar as the basis for the processing is our legitimate interest
9. if consent is the basis of processing withdraw consent at any time without affecting the lawfulness of data processing based on consent before its withdrawal.

You are entitled to these rights in the scope provided for in generally applicable provisions of law.

Requests to exercise the rights referred to above should be sent to the e-mail address odo@base.pl. We do not charge any fees for processing and/or executing any requests to exercise your rights. If for any reason we are unable to comply with your request, we will give you the reason.

If you opt out of receiving communications from us for marketing purposes, please note that we may still contact you for administrative purposes, such as assisting or providing information you have requested or helping to clarify the matter.

RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

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 of personal data violates personal data protection laws. In Poland supervisory authority is President of the Personal Data Protection Office Stawki 2, 00-193 Warsaw, ph.: +48 22 531 03 00.

Should you have any concerns regarding the way in which we process your data, or would like to exercise your rights please contact us via the e-mail address: odo@base.pl.

AUTOMATED DECISION-MAKING

In general Base Group does not use systems for automated decision-making unless stated otherwise in this Privacy Policy or indicated in relevant Privacy Notice available at basemetal.eu/ [GDPR](#).

COOKIE POLICY

Cookies are small text files that are placed on the user's device (computer, laptop, phone) when browsing the Internet. Cookies help us improve our websites, help to provide you with the best experience when you visit our websites and communicate with you, and deliver content relevant to your interests. We may use both our own and third-party cookies. Some cookies are placed by our Partners, acting on our behalf, and may originate from third-party service providers.



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Base Group uses Google Analytics services provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). These services help us analyze how the website is used.

In order to provide you with access to our profiles and individual customization of advertising about our service, data is also processed by the joint controllers of such services as:

- Facebook <https://www.facebook.com/BaseGroupKoszwały/>
- Youtube <https://www.youtube.com/user/BaseGroupKoszwały>.

This allows to formulate the content in a way that is precisely tailored to the client's needs.

Customers who are not also users of, for example, Facebook cannot be analyzed by Meta Ltd. and do not receive personalized advertising.

Base Group uses 3 types of cookies:

1. Necessary, storing visitor preferences and requiring authentication;
2. Necessary for the proper functioning of the website, operability of the website;
3. Functional, collecting analytical data (about user behavior).

These links help us m.in. :

1. adapt the websites to your requirements;
2. facilitate users' access to the website, e.g. by not having to fill in the form again or log in each time after returning to the website;
3. in statistics that help us understand how users use the pages of our website, thanks to which we can improve its structure and content;
4. estimate the number of visitors to our website, including the source and patterns associated with this traffic;
5. in the security of the website. We use cookies to process information that helps us secure our website and the content we post on it;

Each individual cookie consists of 4 basic parts:

1. Website name: the name of the domain or subdomain that set the cookie,
2. Cookie Name: A cookie has a name that is unique to the page that set it.
3. Expiry date: Some cookies expire when you close your browser (so-called session cookies), other cookies will only be automatically deleted when the expiry date that has been set has been reached (so-called persistent cookies).
4. Value: This is the information in the cookie that the website uses to "remember" a previous visit.

COOKIES USED



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Cookie	Duration of storage	Description
pll_language	12 months	Allows to store information about the language set by the user for up to one year. This ensures that our website is immediately displayed in your language the next time you visit.
_ga	24 months	Cookie used by Google Analytics to distinguish user sessions by assigning them randomly generated numbers as customer IDs. It is included in each request to display a subpage on the page and is used to calculate data about visitors, sessions and campaigns for analytical reports.
_gat	1 day	Google Analytics cookie for limiting request speed – limiting data collection on high-traffic websites.
_gid	1 day	Cookie used by Google Analytics to distinguish users, without personally identifiable information.
NID	6 months	NID cookie contains an identifier that Google uses to remember your preferences and other information, in particular your preferred language (e.g., English), the number of search



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Cookie	Duration of storage	Description
		results displayed per page (e.g., 10 or 20), and how Google SafeSearch is turned on or off. These cookies store information that allows you to change the behavior or appearance of the website, which is related to the language version or where you are. For example, by remembering your location, a website can show you local weather forecast or traffic information. These files also make it easy to change the size of the text, typeface and other elements that can be personalized on the website.
elementor	never	This cookie is used by the WordPress theme of the website. It allows the website owner to implement or change the content of the website in real time.

COOKIES MANAGEMENT

Each user can manage cookies and can delete them. Information on this can be found at www.aboutcookies.org You can delete all cookies on your device – just clear your browsing history in your browser. This deletes all cookies from all pages visited. However, you should take into account the loss of stored information (e.g. saved login details, site preferences). Details on how to manage cookies from specific websites can be found in the privacy and cookie settings of the selected browser. Most web browsers automatically accept cookies. However, you can change the settings on your device (computer, laptop, phone) at any time to prevent cookies from being stored. However, setting such a block will mean that you may have to set your preferences again each time you visit the site. Some services and features may not work properly (e.g. logging in to your profile).

GOOGLE ANALYTICS



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For our websites, we use the web analysis tool "Google Analytics" from Google Ireland Limited (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4). Google Analytics creates user profiles on the basis of pseudonyms. For this purpose, permanent cookies are stored on your end device and read by us. This enables us to identify recurring visitors and register them as visitors. Insofar as you have given your consent in accordance with Art. 6(1)(a) GDPR we use cookies from Google Analytics to differentiate, identify and track visitors and to analyse user behaviour. However, we have activated IP anonymisation on our websites, which means that, within the member states of the European Union, your IP address will be shortened before by Google.

DISCLAIMER

Base Group Sp. z o.o. maintains this website containing Privacy Policy to enhance public access to relevant information and offer its products and services. Our goal is to keep this information timely and accurate. If errors are brought to our attention, we will try to correct them. However this information is of a general nature only and is not intended to address the specific circumstances of any particular individual or entity; not necessarily comprehensive, complete, or up to date; sometimes linked to external sites and external Policies over which Base Group Sp. z o. o. may have no control and for which Base Group Sp. z o. o. assumes no responsibility.

This disclaimer is not intended to limit the liability of Base Group Sp. z o.o. in contravention of any requirements laid down in applicable national polish law or EU law nor to exclude its liability for matters which may not be excluded under that law.

By submitting information or material (such as feedback, data, answers, questions, comments, suggestions, ideas, plans, orders, requests or the like) to us, for example by e-mail or via this site, you agree that: (i) the material will not contain any item that is unlawful, libelous, defamatory, obscene, pornographic, abusive, harassing or threatening, or otherwise unfit for publication; (ii) you will use reasonable efforts to scan and remove any viruses or other contaminating or destructive features before submitting any material; (iii) you own the material or have the unlimited right to provide it to us (iv) you agree not to take action against us in relation to material that you submit, and you agree to indemnify us if any party takes action against us in relation to the material you submit.

CHANGES TO THIS POLICY

The information in this Policy was updated on September 19th 2023. We may make changes to the information on this page from time to time, so please check back regularly. The revised information will be effective from the date it is posted on the site and will govern how we collect and use personal information from that point onwards.



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