

ONLINE SERVICE PRIVACY POLICY

1. DEFINITIONS

- 1.1. **Administrator** - AmRest Sp. z o.o. with its registered office in Wrocław, at ul. Powstańców Śląskich 15-17, 53-335 Wrocław.
- 1.2. **Personal data** - information about an identified or identifiable natural person through one or several factors describing physical, physiological, genetic, psychological, economic, cultural or social identity, including a device's IP, location data, online ID and data collected by cookie files or any other similar technology.
- 1.3. **AmRest Group** - dominant entity with its subsidiaries controlled by the dominant entity. AmRest Group includes AmRest sp. z o.o. and AmRest Coffee sp. z o.o.
- 1.4. **Interactive survey** - functionality enabling voting for one of the No Waste, ECO or Local Communities projects carried out by AmRest Group.
- 1.5. **Policy** - this Privacy Policy.
- 1.6. **CSR Report** - an informative or promotional report of AmRest and Amrest Group companies.
- 1.7. **GDPR** - 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.
- 1.8. **Service** - online service managed by the Administrator at amrestcsr.com.
- 1.9. **User** - any natural person visiting the Service or using one or more of the services or functionalities described in the Policy.

2. DATA PROCESSING IN CONNECTION WITH SERVICE USE

- 2.1. In connection with the use of the Service by the User, the Administrator collects data in the scope necessary for providing particular services, as well as information on the User's activity on the Service. Detailed rules and purposes for processing of Personal data collected during the use of the Service by the User are described below.

3. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING ON THE SERVICE

USE OF THE SERVICE

- 3.1. Personal data of all persons using the Service (including IP address or other IDs and information collected by cookie files or any other similar technologies) are processed by the Administrator:
 - for the purpose of providing electronic services in order to make the content gathered on the Service available to the Users - then the legal basis for processing is the necessity to process data in order to perform the agreement (Art. 6 Sec. 1 Letter b of the GDPR);



- for analytical and statistical purposes – then the legal basis for processing is legitimate interest of the Administrator (Art. 6 Sec. 1 Letter f of the GDPR), namely the activity analysis of the Users as well as their preferences to improve the functionalities and services provided;
- for the purpose of making and pursuing or defending against claims – then the legal basis for processing is legitimate interest of the Administrator (Art. 6 Sec. 1 Letter f of the GDPR) aiming at the protection of its rights.

3.2. User's Activity on the Service, including his/her Personal data are registered in system logs (special computer programme for a chronological storing of the log containing information on incidents and activities with regard to the IT system for service provision by the Administrator). Information collected in logs are processed mainly for the purpose of service provision. Administrator processes the data also for technical, administrative purposes and in order to secure and manage the IT system, as well as for analytical and statistical purposes – to this extent the legal basis for processing is legitimate interest of the Administrator (Art. 6 Sec. 1 Letter f of the GDPR).

INTERACTIVE SURVEY OF THE SERVICE, AMREST GROUP CSR REPORT DOWNLOAD

3.3. Service users may cast their votes as part of the interactive survey for one of the AmRest group projects, i.e. No Waste, ECO or Local Communities. Voters are not requested to provide their personal details. The only personal data processed by the Administrator for voting is an ID address. It is processed in order to prevent one person from casting more than one vote. Voter's ID address is stored by the Administrator for 24 hours, after which time it is immediately deleted.

3.4. As part of the Service the Administrator enables CSR Report downloads. For purposes of CSR Report downloads the Administrator does not require Users to provide their personal data.

3.5. Personal data are processed:

- in order to take part in the interactive survey – the legal basis for processing being the necessity of processing in order to perform the agreement under which a vote is to be cast for one of the AmRest group project, i.e. Art. 6 Sec. 1 Letter b of the GDPR;
- in order to take part in the interactive survey and download CSR Report – the legal basis for personal data processing being legitimate interest of the Administrator (Art. 6 Sec. 1 Letter f of the GDPR) in enabling Users to take part in the interactive survey and download AmRest group CSR Report informative and promotional reports;
- for analytical and statistical purposes – the legal basis for processing being legitimate interest of the Administrator (Art. 6 Sec. 1 Letter f of the GDPR) in analysing User's activity on the Service and method of account use as well as Users' preferences in order to improve the functionalities applied;
- in order to determine and seek claims or defend against claims – the legal basis of processing being legitimate interest of the Administrator (Art. 6 Sec. 1 Letter f of the GDPR) in protecting its rights.



4. COOKIE FILES AND SIMILAR TECHNOLOGY

4.1. Cookie files are small text files installed on a device of the Service User. Cookie files collect information which enables use of the website – e.g. by remembering User’s visits on the Service and activities.

“SERVICE” COOKIES

4.2. The so called service cookies are used by the Administrator primarily in order to provide the User with services provided by electronic mail and improve the quality of the services. Therefore, the Administrator and any other of his providers of analytical and statistical services use cookie files by storing information or getting access to information already stored in the User’s end telecommunication device (computer, mobile phone, tablet etc.). Cookie files used for the purpose include:

- user input cookies;
- authentication cookies;
- user centric security cookies;
- multimedia player session cookies;
- user interface customisation cookies.

5. ANALYTICAL TOOLS USED BY ADMINISTRATOR’S PARTNERS

5.1. The Administrator uses the Google Analytics tool for analytical purposes. Below you will find basic information concerning such tools. Detailed information is available in the privacy policy of a given partner. Google Analytics cookie files are used by Google in order to analyse the method of Service use by the User to develop statistics and reports regarding operation of the Service. Google does not use the data collected to identify the User or does not combine the information to enable identification. Detailed information regarding the scope and rules of data collection is available at <https://www.google.com/intl/pl/policies/privacy/partners>.

6. COOKIES SETTINGS MANAGEMENT

6.1. Use of cookie files for data collection, including access to data stored on the User’s devices requires User’s consent, which can be revoked at any time.

6.2. Consent is not required for cookie files which has to be used in order to render the telecommunication service (data transmission for displaying information).

6.3. The consent for cookies use may be revoked by means of web browser settings. Detailed information is available at:

- Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>



- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>

6.4. The User may verify the status of its current privacy settings for the web browser used by means of the tools available at:

- <http://www.youonlinechoices.com/pl/twojewybory>
- <http://optout.aboutads.info/?c=2&lang=EN>

7. DURATION OF PERSONAL DATA PROCESSING

7.1. The duration of data processing by the Administrator depends on the type of service rendered and the purpose of processing. As a rule, the data are processed for the duration of service provision or until the consent given is revoked or an effective objection against data processing is filed if legal basis for processing is legitimate interest of the Administrator.

7.2. Duration of data processing may be extended if processing is necessary to determine and seek claims or defend against claims, and after that time only if and as long as required by law. After processing is completed the data are irrevocably deleted or anonymised.

8. USER'S RIGHTS

8.1. Data subjects have the following rights:

- **right to personal data processing information** – on this basis the Administrator transfers to a requesting natural person data processing information, including in particular the purpose and legal basis for processing, scope of data possessed, entities to whom data are disclosed and expected date of data deletion;
- **right to obtain data copies** – on this basis the Administrator transfers a copy of data processed regarding the requesting natural person;
- **right to make corrections** – the Administrator is obliged to correct any inconsistencies or errors in Personal data processes and supplement them if incomplete;
- **right to delete data** – on this basis deletion of data which need not be processed any more for the purpose of their collection may be requested;
- **right to limit processing** – if so requested, the Administrator discontinues operations involving Personal data – except if consented by the person concerned – and storage in line with the adopted retention rules and until the causes for data processing limitation cease to exist (e.g. a decision is issued by a supervisory authority permitting further processing of data);



- **right to transfer data** – on this basis – as long as data are processed automatically under an agreement or consent – the Administrator transfers the data provided by a person concerned in a computer readable format. Transmission of such data to another entity may also be requested provided it is technically feasible both for the Administrator and the relevant entity;
- **right to object to data processing for marketing purposes** – Data subject may at any time object to Personal data processing for marketing purposes without stating the reason;
- **right to object to other purposes of data processing** – Data subject may at any time object to – for reasons related to his/her specific circumstances – Personal data processing as part of legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for property protection purposes); the objection should be justified;
- **right to revoke consent** – if data are processed under a consent, Data subject may revoke the consent at any time, which does not affect compliance of processing before such revocation;
- **right to complain** – if Personal data processing is found to infringe the GDPR or other Personal data protection regulations, Data subject may file a complaint to an authority supervising Personal data processing competent for the regular residence of the Data subject, his/her place of work or alleged infringement. The Polish supervisory authority is the President of the Personal Data Protection Office.

9. SUBMITTING CLAIMS REGARDING EXERCISE OF RIGHTS

9.1. Claims for exercise of rights of Data subjects may be filed as follows:

- In writing to the Administrator's address;
- Electronically: e-mail address: iod@amrest.euaby.

9.2. The claim should specify the subject of the claim, i.e. in particular:

- which right is to be exercised by the applicant (e.g. right to receive the copy of data, right to delete data, etc.);
- what kind of processing is concerned (e.g. use of a certain service, activity on a given online service, etc.);
- what is the purpose of processing (e.g. analytical purposes).

9.3. If the Administrator is unable to identify a natural person based on the claim submitted, the Administrator shall request additional information from the applicant. Provision of such information is not obligatory, yet non-provision shall result in refusal to process the claim.

9.4. Claims may be submitted personally or via authorised representative (e.g. family member). For data security reasons the Administrator recommends submittal of a power of attorney deed drawn up by a notary or authorised legal counsel or lawyer to facilitate verification of claim authenticity.



- 9.5.** Replies to claims shall be made within one month of receipt thereof. If the period for reply has to be extended, the Administrator shall notify the applicant of the reasons for such extension.
- 9.6.** In case of claims submitted to the Company electronically, replies shall be made in the same form, unless otherwise requested by the applicant. Otherwise, replies shall be made in writing. If due to insufficient period for fulfilling the claim, a reply cannot be made in writing and the scope of applicant's data processed by the Administrator permits electronic contact, the reply shall be made electronically.

10. FEE COLLECTION RULES

10.1. Proceedings regarding claims are not subject to a fee. Fees may be charged in the following cases only:

- claims for the second and each next copy of data (the initial copy of data is free of charge); in which case the Administrator may claim a fee of 20 PLN gross. The amount includes administrative costs of processing the claim;
- excessive number of claims made by the same person (e.g. extremely frequently) or evidently ungrounded; in which case the Administrator may claim a fee of 20 PLN gross. The amount includes costs of communication and costs of initiating actions claimed;

10.2. In case of questioning the decision regarding the Fee, the person concerned may make a complaint to the authority supervising Personal data processing competent for the person's place of residence, place of work or alleged infringement. The Polish supervisory authority is the President of the Personal Data Protection Office.

11. DATA RECEIVERS

11.1. In connection with service provision Personal data will be disclosed to external entities, including in particular entities responsible for IT systems servicers, marketing agencies and entities related with the Administrator, including its capital group companies.

11.2. The Administrator reserves the right to disclose selected information regarding the User to competent authorities or third parties requesting such information in line with the relevant legal basis and the applicable regulations.

12. DATA TRANSMISSION OUTSIDE EEA

12.1. The level of Personal data protection outside the EEA is different from that ensured by the European law. Therefore, the Administrator transmits Personal data outside the EEA only if necessary and if the adequate level of protection is ensured, mainly by:

- cooperation with entities who process Personal data in the countries where a relevant European Commission decision has been enacted certifying that the adequate level of Personal data protection has been ensured;
- adopting standards contractual provisions issued by the European Commission;



- adopting binding corporation rules approved by a competent supervisory authority;
- cooperation with entities participating in the Privacy Shield programme approved by virtue of the European Commission's decision – in case of data transmission to the USA.

13. PERSONAL DATA SECURITY

13.1. The Administrator conducts an ongoing risk analysis in order to ensure that Personal data are processed by the Administrator in a safe manner – ensuring first of all that access to the data is provided to authorised persons and to the extent only as is necessary for the task to be fulfilled. The Administrator ensures that all operations involving Personal data are registered and performed by authorised employees and partners only.

13.2. The Administrator undertakes all necessary endeavours in order to ensure that its subcontractors and other cooperating entities adopt safety measures at all times when personal data are processed on Administrator's order.

14. CONTACT DETAILS

14.1. The Administrator can be contacted by e-mail at iod@amrest.eu or mailing address of AmRest Sp. z o.o. seated in Wrocław at ul. Powstańców Śląskich 15-17, 53-335 Wrocław.

14.2. The Administrator has appointed the Data Protection Inspector, who can be contacted by e-mail at iod@amrest.eu on any issue regarding personal data processing

15. PRIVACY POLICY AMENDMENTS

15.1. The Policy is subject to ongoing verification and updated if necessary.

15.2. The up-to-date version of the Policy has been accepted and is valid as of 29 August 2019.

