

PRIVACY POLICY

I. INTRODUCTION

1. Terra Recycling Spółka z ograniczoną odpowiedzialnością with its registered office at: 42 Traugutta Street, 05-825 Grodzisk Mazowiecki, is the controller of personal data collected in particular via the website available at <https://terrarecycling.pl> (hereinafter referred to as the Website), i.e., the entity deciding on how your personal data will be used (hereinafter referred to as the Controller or TERRA Recycling).

Contact details of the Controller:

- 1) e-mail: biuro@terrarecycling.pl,
- 2) correspondence address: Terra recycling spółka z ograniczoną odpowiedzialnością with its registered office: 42 Traugutta Street, 05-825 Grodzisk Mazowiecki.

The data Controller is responsible for the security of provided personal data and the lawfulness of its processing.

2. In matters related to the processing of personal data and the exercise of data subject's rights in accordance with personal data protection laws, you can contact the Controller using the following e-mail address: gdpr@elemental.biz or the correspondence address provided above.
3. Your personal data is processed in accordance with 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 (hereinafter referred to as GDPR), and other currently applicable personal data protection laws.
4. During a visit to the Website, the following data is collected:
 - 1) personal data provided by the Website user,
 - 2) data obtained and recorded automatically.
5. The purpose and scope of personal data used by the Controller is specified in detail hereinafter.

II. COLLECTED DATA – BASIC INFORMATION

1. The information below applies to all methods of using personal data provided by you by the Controller, indicated in Chapter III and IV.
2. The Controller will not use personal data to make decisions based solely on automated processing of personal data, including profiling within the meaning of Article 22 of the GDPR.
3. Under condition of maintaining all data security guarantees, personal data processed via the Website may be transferred to other entities, such as:
 - 1) entities authorized to receive it in accordance with legal regulations,
 - 2) entities processing it on behalf of the Controller, e.g., technical service providers, hosting service providers, analytical service providers, marketing agencies, and consulting service providers,
 - 3) other data controllers to the extent necessary to perform a contract, provide services and comply with legal requirements, e.g., other entities belonging to the Elemental Capital Group, notarial or law offices, companies providing postal and courier services, other counterparties providing services to the Controller under concluded contracts.
4. The Controller will not transfer your personal data to countries outside the European Economic Area (to countries other than European Union countries and Iceland, Norway, and Liechtenstein).

5. The Controller informs that in connection with the processing of personal data obtained via the Website, each data subject has the right to submit a request to:
 - 1) access data (including to obtain information about what data is processed by the Controller and to what extent, and obtain a copy thereof – details: Article 15 of the GDPR),
 - 2) rectify data (i.e., correct it if the data processed by the Controller is incorrect or incomplete – details: Article 16 of the GDPR),
 - 3) delete data (if, for example, the data is no longer necessary to achieve the purposes for which it was collected or the Controller has no legal basis for the processing thereof – details: Article 17 of the GDPR),
 - 4) restrict data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data is no longer needed by the Controller, but must be processed due to claims pursued by you – details: Article 18 of the GDPR),
 - 5) object to the processing of personal data, including profiling (if personal data is processed based on the legitimate interest of the Controller or is used for direct marketing purposes – details: Article 21 of the GDPR),
 - 6) transfer data to another controller (if the processing of data transferred to the Controller is conducted in an automated manner, based on consent or on the basis of a contract – details: Article 20 of the GDPR),
 - 7) if the processing is carried out based on consent (e.g. consent to use data for marketing purposes, consent to use your image), you have the right to withdraw your consent in any way at any time (withdrawal of consent does not affect the processing of data that was carried out before submitting the declaration of withdrawal of consent).
6. Each data subject also has the right to lodge a complaint with the supervisory authority if he or she believes that the processing of personal data concerning him or her violates the GDPR (for more information please see: <https://uodo.gov.pl/83/155>).
7. TERRA Recycling obtained the data directly from you. The Controller may also process:
 - 1) personal data of other people provided by the user of the Website when using the services described in this “Privacy Policy”,
 - 2) personal data obtained from entities with which the Controller cooperates based on concluded contracts (e.g., business data of employees indicated as contact persons to perform a contract, data of persons participating in events organized by the Controller),
 - 3) personal data obtained from entities belonging to the Elemental Capital Group and other entities cooperating with the Controller, and the data was made available to the Controller based on your consent,
 - 4) data obtained from publicly available sources, e.g., the National Court Register (KRS), the Central Registration and Information on Economic Activity (CEIDG), websites.

III. PERSONAL DATA PROVIDED BY THE USER

III. A. E-MAIL OR PHONE CONTACT DETAILS

1. The Controller processes personal data, in particular name and surname, telephone number, e-mail address and other information provided by you, to the extent necessary to handle requests and inquiries, including to communicate and provide answers to questions asked using the e-mail address and contact telephone number provided on the Website (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).
2. Provision of data is voluntary, but necessary to answer questions asked or to effectively manage the request and process the inquiry. Failure to provide personal data may result in the inability to respond or process the inquiry.

3. The Controller has the right to process personal data for the period necessary to manage the request and the inquiry, including to reply to a message sent or deal with matters, to which the correspondence or telephone conversation relates.

III. B. CONTACT FORM

1. The Controller may collect your personal data via the contact form available on the Website, in particular:
 - 1) e-mail address,
 - 2) telephone number,
 - 3) IP address,
 - 4) other information provided by you with the use of the form (e.g., name and surname, company name).
2. The Controller processes personal data only to the extent necessary:
 - 1) to receive and process a request, including exchange correspondence and provide answers to requests and questions submitted via the contact form (legal basis: Article 6(1)(f) of the GDPR – legitimate interest),
 - 2) to establish contact (using the selected communication channel) and to prepare and present a dedicated offer in response to the request of the Website user submitted via the form (legal basis: Article 6(1)(b) of the GDPR – acting at the request of the data subject before concluding a contract).
3. The Controller has the right to process personal data for the period necessary to achieve the above-mentioned purposes. Depending on the legal basis, this will be, respectively:
 - 1) the time necessary to process the request and respond to the inquiry sent by the user via the contact form,
 - 2) the time necessary to prepare and submit a dedicated offer.
4. Provision of data indicated in the contact form is voluntary, but necessary to effectively manage the request, answer questions asked or prepare and present a dedicated offer. Failure to provide personal data may result in the inability to respond, process the inquiry, or present the offer.

III. C. IRREGULARITY REPORTING FORMS

1. The Controller may collect personal data of employees, partners, and stakeholders of TERRA Recycling who report irregularities via dedicated online forms, following the procedure of reporting irregularities applicable in the Elemental Capital Group. Detailed information on the processing of personal data is available on the GDPR bookmark on the website.

III. D. LINKEDIN

1. Terra Recycling is the controller of personal data of users using the services and products offered by LinkedIn Ireland Unlimited Company, headquartered: Wilton Place, Dublin 2, Ireland (hereinafter: LinkedIn), who visit the Administrator's website available at: <https://pl.linkedin.com/company/terra-recycling-pl> hereinafter: Company's Website). As the Controller, it is responsible for the security of the personal data provided and processing in accordance with the law.
2. The Controller processes personal data of users who, using LinkedIn products and services, visit the Company Website. This data is processed:
 - 1) in connection with the operation of the Company's Website, including the promotion of its own brand (legal basis: Article 6(1)(f) GDPR - legitimate interest),
 - 2) for the purpose of responding to inquiries made through the services offered by LinkedIn (legal basis: Article 6(1)(f) of the GDPR - legitimate interest); if you provide specific

categories of data (e.g., health information), you state that you consent to their use for the proper handling of the request and fulfillment of the inquiry, including communication and response (legal basis: Article 9(2)(a) of the GDPR - consent).

3. The Contractor has the right to process:
 - 1) publicly available personal information (such as username, profile picture, activity status on LinkedIn), content of comments and other information publicly shared by a user using LinkedIn products and services,
 - 2) personal data provided by a user visiting the Company Website, including the collection of information provided in the user's profile and other content, comments, messages and communications (e.g. photos, contact information, place of work, place of residence, information on education, interests or worldview beliefs),
 - 3) other personal information provided by users in the content of messages through LinkedIn services (including contact information and health information) for the purpose of responding to the inquiry sent or for the purpose of fulfilling a request for contact.
4. The scope of personal data processing, the specific purposes, and the rights and obligations of the user using LinkedIn's products and services are derived directly from:
 - 1) LinkedIn's rules and regulations (the document is available on LinkedIn at: <https://pl.linkedin.com/legal/user-agreement>),
 - 2) "LinkedIn Privacy Policy" (the document is available on LinkedIn's website at: <https://pl.linkedin.com/legal/privacy-policy>) or
 - 3) laws- and are refined as a result of the user's actions on the LinkedIn social network.
5. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
 - 1) time until you object (or delete your LinkedIn user account),
 - 2) time until you withdraw your consent (or delete your LinkedIn user account). The withdrawal of consent does not affect the lawfulness of data processing during the period when the consent was in effect;
 - 3) the period of time necessary to handle the inquiry sent by the user through LinkedIn services.
6. The catalog of recipients of personal data processed by the Controller is primarily based on the range of products and services used by the LinkedIn user, but also on the user's consent or by law. With all guarantees of data security, the Controller may transfer personal data of a user visiting the Company Website to other entities that process data on behalf of the Controller, e.g. technical service providers and consulting service providers (including law firms) and contractors that perform services for the Controller on the basis of concluded agreements.
7. The Controller will not transfer personal data of a user using the services and LinkedIn products to countries outside the European Economic Area (to countries other than countries of the European Union and Iceland, Norway and Liechtenstein).
8. The Controller may process personal data of users who use LinkedIn products and LinkedIn services who visit the Company Website in order to analyze users' use of the Company's Website and related content (conducting statistics) - where users' use of the Company Website and related content triggers the creation of an event for the site's statistics, with which the processing of personal data is associated (legal basis: Article 6(1)(f) GDPR - legitimate interest).
9. In the case of personal data processed for the purpose of keeping statistics on your actions taken on the Company Website (including watching or stopping watching the Company Website, recommending the Company Website in a post or comment), TERRA Recycling and LinkedIn are joint controllers of your personal data. The types of data and the scope of their processing, as well as the principles of privacy protection and the rights of users, are indicated in detail:

- 1) in this document,
 - 2) in LinkedIn's Privacy Policy document, published on LinkedIn's website at: <https://pl.linkedin.com/legal/privacy-policy>,
 - 3) in the document "Page Insights Joint Controller Addendum," published on LinkedIn at: <https://legal.linkedin.com/pages-joint-controller-addendum>.
10. It is LinkedIn's responsibility to notify users who use LinkedIn's products and services of the processing of data for site statistics and to enable them to exercise their rights under the GDPR (information about the data used for site statistics has been made available on LinkedIn's website at: <https://pl.linkedin.com/legal/privacy-policy>).
11. LinkedIn's Data Protection Officer can be contacted via the form available at: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>.

IV. DATA COLLECTED AUTOMATICALLY

1. Use of the website available at <https://terrarecycling.pl> involves sending queries to the server, which are automatically saved in the event logs.
2. Data regarding user sessions are saved in event logs. This is in particular: IP address, type and name of the device, information about the web browser and operating system, date, and time of visiting the Website.
3. Data recorded in event logs is not associated with specific people.
4. Event logs can be accessed by persons authorized by the Controller to administer the Website.
5. The chronological record of information about events is only auxiliary material, used for administrative purposes. The analysis of event logs allows, in particular, identification of threats, ensuring proper security of the Website and creating statistics to find out how the Website is used by its users.
6. Data regarding user sessions is used by the Controller to diagnose problems related to the operation of the Website and analyze possible security breaches, manage the Website and to keep statistics (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).
7. We use cookies on the Website. More information on this subject can be found in the "Cookie Policy" available at <https://terrarecycling.pl/polityka-cookies>.

V. FINAL PROVISIONS

1. This "Privacy Policy" serves information purposes and applies in particular to the Controller's website available at <https://terrarecycling.pl>.
2. The Website may contain links to other websites, in particular to the websites of entities belonging to the Elemental Capital Group, to the websites of TERRA Recycling service providers and partners as well as to social networks e.g. LinkedIn. The Controller recommends that every user, after visiting the websites of other entities, read the privacy policies applicable there.
3. The Controller reserves the right to introduce changes to the applicable "Privacy Policy", in particular in the case of:
 - 1) technology development,
 - 2) changes to generally applicable provisions of law, including those regarding personal data protection or information security,
 - 3) Website development, including the implementation of new services and functionalities.
4. The Controller will notify users about relevant changes in the "Privacy Policy", in particular by posting an announcement on the Website.

5. This version of the “Privacy Policy” is effective as of January 1, 2025.