

### PRIVACY POLICY (PERSONAL DATA SAFETY)

#### Chapter 1

##### Declaration of intention, aims and scope of privacy policy

1. Zdrofit Sp. z o.o., hereinafter referred to as "Zdrofit" as an Administrator as defined in Art. 4(1)(7) of GDPR processes personal data pursuant to applicable law, internal regulations and good practices.
2. The aim of the Policy is to protect personal data processed in Zdrofit in the way of ensuring the following properties of the data:
  - a. Confidentiality – the property asserts that only authorized persons have access to the data.
  - b. Integrity – the property asserts that the personal data has not been altered or destroyed in unauthorized manner.
  - c. Accessibility – the property asserts that the personal data is accessible for persons authorized to process it.
3. The policy defines rules of the protection of personal data and covers any person participating in the processing of personal data in Zdrofit.
4. Zdrofit appoints Data Protection Officer responsible for supervision over the application of regulations concerning personal data protection. Contact with DPO: [iodo@zdrofit.pl](mailto:iodo@zdrofit.pl).

#### Chapter 2

##### General rules of personal data protection

1. Processing of personal data (DO) in Zdrofit is executed especially in accordance with rules provided for in Art. 5 and 6 of GDPR.
2. It is permissible to process special categories of personal data in accordance with rules provided for in Art. 9 of GDPR.
3. Zdrofit executes rights of persons whom the data concerns especially by:
  - a. Transparent information and communication, as well as the course of exercising of rights by a person whom the data concerns.
  - b. Fulfilment of the information obligation executed while collecting the data from the person it concerns.
  - c. Execution of rights of access of persons whom the data concerns.
  - d. Execution of a right to amend the data.
  - e. Execution of the right to delete the data ("a right to be forgotten").
  - f. Execution of a right to limit processing of the data.
  - g. Notifying of amendment or deletion of personal data or limitation of processing of the data.
  - h. Execution of a right to transfer the data.
  - i. Execution of a right to object.
4. Zdrofit takes protection of personal data into consideration on the stage of designing.
5. Zdrofit verifies carefully any processing entities that process personal data on its behalf.

#### Chapter 3 Protection measures

1. To ensure confidentiality, integrity and accessibility of personal data processed, Zdrofit applies the following measures:
  - a. personal protection measures,
  - b. organizational measures,
  - c. technical protection measures.
2. Appropriate safety level is determined based on conducted risk analysis and introduction of protection minimizing risk to acceptable level.
3. In order to maintain appropriate safety level, the rule of continuous improvement, so-called PDCA method, is applied.
4. An assessment of personal data safety is conducted annually.