

Applicable as of 25 May 2018

Farm Frites Poland SA makes every effort to protect the privacy of any and all natural persons whose personal data are processed by our company in connection with its operations.

Having regard to the fact that the General Data Protection Regulation (the 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 (the General Data Protection Regulation) comes into full force and effect as of 25 May 2018, we present you this document to notify about the purpose as well as the principles of the processing of your personal data by FFP SA.

1. WHAT TERMS DO WE USE IN OUR PRIVACY POLICY?

Personal data – any information relating to a natural person who can be identified by using such information. This Privacy Policy explains how we use the personal data provided by you to us.

We – <u>contact details:</u> Farm Frites Poland SA with its registered office in Lębork, ul. Abrahama 13, mail: <u>office@ffp.pl</u>, telephone: (59) 862 91 00.

Contractor – an employee who renders services for the benefit of FFP SA under a civil law contract.

External firm employee – an employee who renders a service for the benefit of FFP SA under a contract entered into by and between FFP and FFP business partners.

Website –website maintained by us: www.ffp.pl.

YOUR PERSONAL DATA - WHAT IS IT?

What we understand by personal data is any information relating to a natural person who can be identified by using such information. The processing of your personal data is regulated by the General Data Protection Regulation 2016/679 (the GDPR) which will start to apply as 25 May 2018. This information explains how we protect and process the personal data of our FFP employees and of the employees carrying out work commissioned by FFP (contractors).



WHO ARE WE?

We are the controller of your personal data. This means that we determine how and for what purposes your personal data, which you gave us when you wanted to become our employee or contractor, are processed. We want you to know that we take every effort to ensure that your personal data are safe. We do not trade any personal data provided to us.

HOW TO CONTACT US?

If you have any questions regarding the processing of your personal data by us, please contact us using the **contact details** below:

Farm Frites Poland SA with its registered office in Lebork, ul. Abrahama 13, e-mail: office@ffp.pl, telephone: (59) 862 91 00.

HOW DO WE PROCESS YOUR PERSONAL DATA?

Due to our operations, personal data are processed by us for different purposes, to a various extent and under different legal basis as set out by the GDPR. In order to give you possibly the clearest information, we have grouped the information by referring to the purpose of the processing of your personal data.

I. PROCESSING OF THE PERSONAL DATA OF OUR EMPLOYEES

Item	PURPOSE OF PROCESSING	PERIOD OF PROCESSING	LEGAL BASIS
1	We process your personal data for the purposes of entering into the contract of employment with you and its performance.	For the period of 50 years from the date of the termination of the employment relationship.	Compliance with a legal obligation (art. 22(1) § 1, § 2 and § 4 of the Labour Code in conj. with the GDPR art. 6 subpara 1 point c).
2	We process your personal data to register our employees and members of their families with National Insurance System, update the registration and transmit information about sick leaves.	For the period of 50 years from the date of the termination of the employment relationship.	Compliance with a legal obligation (art. 1, art. 6 and art. 6a of the National Insurance System Act in conj. with the GDPR art. 6 subpara



			1 point c).
3	We process your personal data in order to comply with a legal obligation to maintain and store employee personal files and payroll documentation.	For the period of 50 years from the date of the termination of the employment relationship.	Compliance with a legal obligation (art. 94 points 9a & 9b of the Labour Code in conj. with art. 16b para 2 point 6 of the National Archival Fonds and Archives Act and in conj. the GDPR art. 6 para 1 point c).
4	We process your personal data to comply with a legal obligation to maintain and store pay documentation of our employees and to issue relevant certificates a payer of NI contributions is required to issue in connection with retirement pension and disability pension insurance.	For the period of 50 years from the date of the termination of the employment relationship.	Compliance with a legal obligation (art. 125a paragraphs 1-4 of the National Insurance Fund Pensions and Benefits Act in conj. the GDPR art. 6 subpara 1 point c).
5	We process your personal data to settle accounts with our employees, calculate and pay remunerations and NI contributions.	For the period of 50 years from the date of the termination of the employment relationship.	Compliance with a legal obligation (Chapter III – Remunerations of the Labour Code in conj. with art. 1, art. 6 & art. 6a National Insurance System Act in conj. with the GDPR art. 6 subpara 1 point c).
6	We process your personal data to comply with a legal obligation to store accident documentation if you had an accident at work.	For the period of 10 years from the date of the drawing up of the accident documentation.	Compliance with a legal obligation (art. 234 § 31 of the Labour Code in conj. with the GDPR art. 6 subpara 1 point c).
7	We process your personal data to comply with our legal obligation to guarantee our employees preliminary, periodic and follow-up medical examinations and other medical care services required for the purposes of employment relationship and performed under a	For the period of 50 years from the date of the termination of the employment relationship, as an element of employee personal file.	Compliance with a legal obligation (art. 12 of the Occupational Medical Services Act in conj. with the GDPR art. 6 subpara 1 point c).



	contract with an entity providing occupational medicine services.		
8	We process your personal data to ensure our employees access to private medical care within the frames of group health insurance.	For as long as you remain our employee and wish to be covered by the private medical care scheme or until you withdraw your consent for your data being processed for this purpose.	Freely given consent (the GDPR art. 6 subara 1 point a).
9	If your official tasks and duties involve driving a company car, we will process your personal data to comply with our legal obligation to ensure our employees relevant medical examinations.	For the period of 50 years from the date of the termination of the employment relationship, as an element of employee personal file.	Compliance with a legal obligation (art. 75 of the Drivers Act in conj. with the GDPR art. 6 subpara 1 point c).
10	We process your personal data to ensure that our established procedures, policies and other internal documents regulating behaviour in the workplace are complied with, and to take disciplinary actions in this respect.	For the duration of the employment relationship.	Necessary for the performance of a contract of employment with an employee (the GDPR art. 6 subpara 1 point b).
11	We process your personal data to ensure that our employees and property are safeguarded against damage, theft, legal responsibility, fraud, abuse or other violation or offence.	For the duration of the employment relationship.	Our legitimate interest consisting in ensuring that our property and employees are safeguarded from illegal actions (the GDPR art. 6 subpara 1 point f).
12	We process your personal data for conducting periodic evaluation of our employees, their progress, development, level of satisfaction as regards the official task and duties they have been entrusted with, and for efficiency management.	For the duration of the employment relationship.	Our legitimate interest consisting in examining the development and satisfaction of our employees in connection with possible changes of the terms and conditions of employment or



			promotion, and efficiency management as well as intelligent planning (the GDPR art. 6 subpara 1 point f).
13	We process your personal data to ensure our employees possibilities to improve their professional qualifications and skills by ensuring them a participation in proper trainings and courses.	For the duration of the employment relationship.	Necessary for the performance of a contract of employment with an employee (the GDPR art. 6 subpara 1 point b).
14	We process your personal data to promote our activity on our Facebook fan page.	For the duration of the employment relationship and until the withdrawal of your consent	Freely given consent (the GDPR art. 6 subara 1 point a).
15	We process your personal data to defend or assert claims arising out from the employment relationship.	For the period of 3 years from the date of the termination of the employment relationship, pursuant to art. 291 §§ 1, 2 of the Labour Code.	Our legitimate interest consisting in the defence of or asserting claims arising out from the employment relationship. (the GDPR art. 6 subpara 1 point f).
16	We process your personal data to ensure that our employees and property are safeguarded against damage, theft, legal responsibility, fraud, abuse or other violation or offence, using, among others, video surveillance.	We process your personal data for this purpose for the duration of the employment relationship, and 3 consecutive months from the moment of the video recording of the image.	Our legitimate interest consisting in ensuring that our property and employees are safeguarded from illegal actions (the GDPR art. 6 subpara 1 point f).
17	We process your personal data to register our employees and members of their families for the Employee Benefit Fund in order to use the money from this Fund.	Your personal data are processed by us for this purpose for the period that is not longer than it is necessary to grant access to a subsidised service and employee	Compliance with a legal obligation (art. 3 para 1 of the Employee Benefit Fund Act in conj. with the GDPR art. 9 subpara 2 point b).



		benefit and partial funding from the Fund as well as to determine their amount, and for the period during which the rights to such service, benefit partial funding or claims are asserted.	
18	We process your personal data to promote our activity by commercial information prepared by us (newsletter) and presentations in this respect.	For the duration of the employment relationship and until the withdrawal of the consent by you.	Freely given consent (the GDPR art. 6 subara 1 point a).

II. CATEGORIES OF THE RECIPIENTS OF YOUR PERSONAL DATA

1. Entities providing accounting and bookkeeping services

We use services of entities providing accounting and payroll services to the extent required by applicable law.

2. Entities rendering OHS services

We use services of entities rendering professional services related to the organisation and giving OHS training for our employees, which is necessary for the discharge of our obligations to which we are the subject as the employer.

3. Occupational Medical Service

We use services of entities rendering professional occupational medical services, which is necessary for the discharge of our obligations to which we are the subject as the employer.

4. Entities providing private medical care services

We use services of entities providing professional private medical care services resulting from group health insurance coverage for our employees.



5. Entities rendering security services

We use services of entities providing professional property security and surveillance services to ensure security to our employees and property.

6. Entities providing health insurance coverage.

We use services of entities rendering professional services related to the provision of health insurance coverage for our employees.

7. Entities carrying out psychotechnical assessments of employees

We use services of entities carrying out, at our request, psychotechnical assessment of our employees.

8. Entities rendering training and e-learning services

We use services of entities rendering, at our request, services consisting in organising and providing trainings and courses for our employees in order for them to improve their skills and qualifications.

9. IT services providers

We use services of entities which render IT services professionally and provide us with tools that are necessary to evaluate competences of our employees and to fulfil our tasks as the employer. We take utmost care to ensure that your personal data are safe, up-to-date and that they are kept confidential at all times.

10. Business partners and cooperating entities

On account of our operations, we cooperate with and use services provided by numerous entities which support our activities.

11. Professional legal advisers

We use services of entities which provide professional services related to legal assistance.

12. Entities rendering storage and archiving services



We use services of entities which provide professional employee documentation storage services.

13. Entities rendering secure document and other data carrier destruction services

We use services of entities which provide professional services in the area of secure destruction of documents and other data carriers.

14. Relevant public administration authorities

Some personal data related to our employees are transferred to relevant public authorities in order for us to discharge the obligations to which we are the subject.

15. Postal or courier service

We use services of entities which provide postal and courier services professionally.

III. PROCESSING OF THE PERSONAL DATA OF EXTERNAL FIRM EMPLOYEES

Item	PURPOSE OF PROCESSING	PERIOD OF PROCESSING	LEGAL BASIS
1	We process your personal data to comply with a legal obligation to store accident documentation if you had an accident at work.	For the period of 10 years from the date of the drawing up of the accident documentation.	Compliance with a legal obligation (art. 234 § 31 of the Labour Code in conj. with the GDPR art. 6 subpara 1 point c).
2	We process your personal data to ensure that our established procedures, policies and other internal documents regulating behaviour in the workplace are complied with and to take disciplinary actions in this respect.	For the duration of the employment relationship.	Necessary for the performance of a contract of employment with an employee (the GDPR art. 6 subpara 1 point b).
3	We process your personal data to ensure that our employees and property are safeguarded against damage, theft, legal responsibility, fraud, abuse or other violation or offence.	For the duration of the employment relationship.	Our legitimate interest consisting in ensuring that our property and employees are safeguarded from illegal actions (the GDPR art. 6 subpara 1 point f).



4	We process your personal data to ensure our employees possibilities to improve their professional qualifications and skills by ensuring them a participation in proper trainings and courses.	For the duration of the employment relationship.	Necessary for the performance of a contract of employment with an employee (the GDPR art. 6 subpara 1 point b).
5	We process your personal data to promote our activity on our Facebook fan page.	For the duration of the employment relationship and until the withdrawal of your consent	Freely given consent (the GDPR art. 6 subara 1 point a).
6	We process your personal data to ensure that our employees and property are safeguarded against damage, theft, legal responsibility, fraud, abuse or other violation or offence, using, among others, video surveillance.	We process your personal data for this purpose for the duration of the employment relationship, and 3 consecutive months from the moment of the video recording of the image.	Our legitimate interest consisting in ensuring that our property and employees are safeguarded from illegal actions (the GDPR art. 6 subpara 1 point f).
7	We process your personal data to promote our activity by commercial information prepared by us (newsletter) and presentations in this respect.	For the duration of the employment relationship and until the withdrawal of the consent by you.	Freely given consent (the GDPR art. 6 subara 1 point a).

IV. CATEGORIES OF THE RECIPIENTS OF YOUR PERSONAL DATA

1. Entities rendering OHS services

We use services of entities rendering professional services related to the organisation and giving OHS training for our employees, which is necessary for the discharge of our obligations to which we are the subject as the employer.

2. Occupational Medical Service

We use services of entities rendering professional occupational medical services, which is necessary for the discharge of our obligations to which we are the subject as the employer.



3. Entities rendering security services

We use services of entities providing professional property security and surveillance services to ensure security to our employees and property.

4. Entities rendering training and e-learning services

We use services of entities rendering, at our request, services consisting in organising and providing trainings and courses for our employees in order for them to improve their skills and qualifications.

5. IT services providers

We use services of entities which render IT services professionally and provide us with tools that are necessary to evaluate competences of our employees and to fulfil our tasks as the employer. We take utmost care to ensure that your personal data are safe, up-to-date and that they are kept confidential at all times.

6. Business partners and cooperating entities

On account of our operations, we cooperate with and use services provided by numerous entities which support our activities.

7. Professional legal advisers

We use services of entities which provide professional services related to legal assistance.

8. Entities rendering storage and archiving services

We use services of entities which provide professional employee documentation storage services.

9. Entities rendering secure document and other data carrier destruction services

We use services of entities which provide professional services in the area of secure destruction of documents and other data carriers.

10. Relevant public administration authorities



Some personal data related to our employees are transferred to relevant public authorities in order for us to discharge the obligations to which we are the subject.

11. Postal or courier service

We use services of entities which provide postal and courier services professionally.

V. PROCESSING OF THE PERSONAL DATA OF CONTRACTORS

Item	PURPOSE OF PROCESSING	PERIOD OF PROCESSING	LEGAL BASIS
1	We process your personal data to enter into a contract of mandate with you and to perform the contract.	We process your personal data for this purpose for the duration of a contract and until the expiry of the limitation period in respect of any claims resulting out from the contract.	Necessary for the performance of a contract of mandate (the GDPR art. 6 subpara 1 point b).
2	We process your personal data for the purposes of registration with National Insurance System, and any subsequent updates to such registration.	We process your personal data for this purpose for the duration of a contract of mandate.	Compliance with a legal obligation (art. 6 para 1 point 4, art. 9 para 2c, art. 36 para 1 and art. 14 of the National Insurance System Act in conj. with the GDPR art. 6 subpara 1 point c).
3	We process your personal data to comply with a legal obligation to maintain and store accounting documentation regarding our contractors.	We process your personal data for this purpose for the period of 5 years from the termination of a contract of mandate.	Compliance with a legal obligation (art. 74 para 2 point 8 of the Accounting Act in conj. with the GDPR art. 6 subpara 1 point c).
4	We process your personal data to calculate and pay NI contributions to the National Insurance System and to store relevant accounting documentation.	We process your personal data for this purpose for the period of 5 years from the date of transferring of relevant accounting	Compliance with a legal obligation (art. 47 para 3c of the National Insurance System Act in conj. with the GDPR art. 6 subpara 1 point c).



		documentation to the National Insurance System.	
5	We process your personal data to ensure you access to private medical care within the frames of group health insurance.	We process your personal data for this purpose for as long as we are bound by a contract of mandate and you wish to be covered by the private medical care scheme or until you withdraw your consent for your data being processed for this purpose.	Freely given consent (the GDPR art. 6 subara 1 point a).
6	If the provision of services by you involves driving our company car that is put at your disposal, we will process your personal data to arrange for medical examinations in order to confirm your driving entitlements.	We process your personal data for this purpose for the duration of a contract of mandate.	Necessary for the performance of a contract of mandate (the GDPR art. 6 subpara 1 point b).
7	We process your personal data to ensure that our established procedures, policies and other internal documents regulating behaviour of the people cooperating with us are complied with.	We process your personal data for this purpose for the duration of a contract of mandate.	Necessary for the performance of a contract of mandate (the GDPR art. 6 subpara 1 point b).
8	We process your personal data to ensure that our co-operators and property are safeguarded against damage, theft, legal responsibility, fraud, abuse or other violation or offence.	We process your personal data for this purpose for the duration of a contract of mandate.	Our legitimate interest consisting in ensuring that our property and co-operators are safeguarded from illegal actions (the GDPR art. 6 subpara 1 point f).
9	We process your personal data for conducting periodic evaluation of the quality of services rendered by you, and for efficiency	We process your personal data for this purpose for the duration of a contract	Our legitimate interest consisting in examining and evaluation of the quality of services



	management.	of mandate.	rendered by our contractors as well as efficiency management and intelligent planning (the GDPR art. 6 subpara 1 point f).
10	We process your personal data to ensure you possibilities to improve your skills and qualifications by ensuring you a participation in proper trainings and courses.	We process your personal data for this purpose for the duration of a contract of mandate.	Necessary for the performance of a contract of mandate (the GDPR art. 6 subpara 1 point b).
11	We process your personal data to ensure that our employees and property are safeguarded against damage, theft, legal responsibility, fraud, abuse or other violation or offence, using, among others, video surveillance.	We process your personal data for this purpose for the duration of a contract of mandate.	Our legitimate interest consisting in ensuring that our property and employees are safeguarded from illegal actions (the GDPR art. 6 subpara 1 point f).

VI. CATEGORIES OF THE RECIPIENTS OF THE PERSONAL DATA OF CONTRACTORS

1. Entities carrying out psychotechnical assessments

We use services of entities carrying out, at our request, psychotechnical assessment of our contractors.

2. Entities rendering training and e-learning services

We use services of entities rendering, at our request, services consisting in organising and providing trainings and courses improving skills and qualifications.

3. IT services providers

We use services of entities which render IT services professionally and provide us with tools that are necessary to evaluate the quality of the services rendered by our



contractors and to fulfil our tasks as the employer. We take utmost care to ensure that your personal data are safe, up-to-date and that they are kept confidential at all times.

4. Entities providing health insurance coverage.

We use services of entities rendering professional services related to the provision of health insurance coverage for our contractors.

5. Business partners and cooperating entities

On account of our operations, we cooperate with and use services provided by numerous entities which support our activities.

6. Professional legal advisers

We use services of entities which provide professional services related to legal assistance.

7. Entities rendering storage and archiving services

We use services of entities which provide professional documentation storage services.

8. Entities rendering secure document and other data carrier destruction services

We use services of entities which provide professional services in the area of secure destruction of documents and other data carriers.

9. Relevant public administration authorities

Some personal data are transferred to relevant public authorities in order for us to discharge the obligations to which we are the subject.

10. Postal or courier service

We use services of entities which provide postal and courier services professionally.

VII. WHAT ARE YOUR RIGHTS RELATING TO THE PROCESSING OF YOUR PERSONAL DATA?



We guarantee the exercise of your rights referred to below. You may exercise your rights by submitting your request using the contact details given by us.

1. Right to withdraw your consent

You have the right to withdraw at any time every consent you have given us to process your personal data. The withdrawal of your consent will take effect as of the moment of the withdrawal. The withdrawal of your consent will not affect the lawfulness of the processing based on consent before its withdrawal.

The withdrawal of your consent shall not carry any negative consequences for you. It may, however, make it impossible for us to carry out our activities for your benefit or for you to use our functionalities which, according to law, can be provided by us only with your consent.

Legal basis: the GDPR art. 7 subpara 3.

2. Right to object to processing of personal data.

You have the right to object at any time to the processing of your personal data if we process your data based on our legitimate interest.

If your objection proves to be legitimate and we will have no other legal basis to process your personal data, then we will erase your personal data to the processing of which you objected.

Legal basis: the GDPR art. 21.

3. Right to erasure of personal data ("the right to be forgotten")

You have the right to request that all or some of your personal data be erased. Notwithstanding your request to erase your personal data, as a result of lodging an objection or withdrawing your consent, we may keep certain personal data to the extent necessary for the establishment, exercise or defence of legal claims related to the processing of your personal data. This in particular applies to the personal data such as: your name, surname and information about consents given by you or activity history, i.e. the data we keep for the purposes of handling of complaints and claims related to the processing of your personal data resulting from the legal relation between you and ourselves. We will process your personal data for this purpose for the period of 10 years from the termination of the legal



relation between us. The legal basis for your personal data being processed by us for this purpose is our legitimate interest. (the GDPR art. 6 subpara 1 point f).

Legal basis: the GDPR art. 17.

4. Right to restriction of processing of personal data

You have the right to obtain from us restriction of the processing of your personal data. If you submit such a request, then, until the request has been dealt with, you will be prevented from using certain functionalities or services, the use of which involves processing of the data covered by the request. We will not send any additional communications to you either.

Legal basis: the GDPR art. 18.

5. Right of access to personal data

You have the right to obtain from us confirmation as to whether or not we process your personal data and, where that is the case, you have the right to:

- a) obtain access to your personal data;
- b) obtain information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of the recipients of our personal data, the envisaged period for which your personal data will be stored or the criteria used to determine that period, your rights resulting from the GDPR as well as about your right to lodge a complaint with a supervisory authority, the source of your personal data, the existence of automated decision-making, including profiling, and about the safeguards used in relation to the transfer of your personal data outside the European Union;
- c) obtain a copy of your personal data.

Legal basis: the GDPR art. 15.

6. Right to rectification of personal data

You have the right to obtain from us the rectification of inaccurate personal data and to have incomplete personal data completed (if they are incomplete).

Legal basis: the GDPR art. 16.

7. Right to data portability



You have the right to receive your personal data, which you have provided to us, and to transmit the data to another controller of your choice.

You also have the right to have the personal data transmitted directly from us to such another controller, where technically feasible.

Legal basis: the GDPR art. 20.

8. Right to lodge a complaint

Any complaints, requests and questions regarding the processing of your personal data as well the exercise of your rights may be directed to us.

If you think that your right to the protection of your personal data or any other rights which you have been granted under the GDPR have been infringed, you have the right to lodge a complaint with the Inspector General for Personal Data Protection (the President of the Office of Personal Data Protection in the future).

Legal basis: the GDPR art. 13 subpara 2 point d).

VIII. IS PROVISION OF YOUR PERSONAL DATA OBLIGATORY?

Provision by you of your personal data is not obligatory. However, this is necessary to enter into a contract of employment or a contract of mandate with you, to comply with provisions of the contracts and to fulfil our mutual obligations. Without you providing your personal data we cannot enter into contracts and fulfil legal obligations imposed on us by law as a result of entering into the contract.

WILL YOUR PERSONAL DATA BE TRANSFERRED TO ANY NON-EEA COUNTRIES?

We do not transfer your personal data outside the European Economic Area (the EEA). Only companies from the EEA are the processors whose services we use and with whom we have signed relevant contracts in compliance with the GDPR. You can find information about the processing of personal data by our processors on our Intranet in the <u>Dane osobowe</u>. RODO



bookmark. If you have any questions, please contact us by writing to this email address: office@ffp.pl.

WILL YOUR PERSONAL DATA BE USED FOR THE PURPOSES OF PROFILING OR OTHER AUTOMATED DECISION-MAKING PROCESS?

We will not subject your personal data to profiling or any other automated decision-making process.

REVISED VERSIONS OF THIS INFORMATION

We may change or complete this information if need be. We will notify you of any changes or additions by placing relevant information on our website: www.ffp.pl and in the case of significant changes, we may also send an individual notification to your work email address or make such information available in some other way.