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## Privacy Policy.

### §1. Definitions

The following terms used in the present Privacy Policy should be understood as follows:

**PRONAR** – PRONAR sp. z o.o. with registered headquarters in Narew, at ul. Adama Mickiewicza 101 A, 17-210 Narew, entered on the register of entrepreneurs of the National Court Register (KRS) kept by the District Court in Białystok. The KRS keeps the registration files as number KRS 0000139188, BDO with share capital of 51,000 PLN covered in full, tax ID NIP: 543-02-00-939, company ID REGON:008002850.

**Website** - the website belonging to **PRONAR**, at the address [www.pronar.pl](http://www.pronar.pl)

**Services** - all the services provided electronically by PRONAR to the User based on the present Privacy Policy (e.g. the Newsletter)

**User** - each physical person, legal person or entity without legal personality or with legal capacity, who or which uses the particular functions of the Website or Services.

**Personal Details** – information collected during registration on the Website, enabling identification of a given physical person, processed by the Website within the scope necessary to make contact with the User and to enable the User to use particular functions of the website.

**Electronic address** - designation of teleinformatic system enabling communication by electronic means, particularly an email address.

**Registration form** - the form completed by the User allowing the User to make use of particular functions of the website (e.g. after receipt of the Newsletter).

**Commercial Messages** -all information intended to promote, directly or indirectly, the services or image of PRONAR, excluding information enabling communication by electronic means with a specific person, and information about services which does not serve to achieve a commercial effect desired by PRONAR.



**Cookies** - short text files in which the servers of PRONAR's website record information on the hard disc of the computer used by the User. The information stored in the cookie file of the servers of PRONAR's website can be read when that computer reconnects, but it can also be read by other servers or other internet users.

**IP address** - the individual number of each computer connected to a computer network.

**GDPR** - Regulation of the European Parliament and of the Council (EU) no. 2016/679 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 (General Data Protection Regulation).

## §2. Cookies

1. PRONAR places "cookies" in Website Users' end-devices in order to facilitate navigation and enabling basic functions. Cookie files („Cookies”) are short text files stored by PRONAR's communication and information systems in end-devices of the Website User (i.e. on a hard drive of website visitors). Cookies are used to identify the Users and to collect general information about the use of the Website.

2. Pronar uses the following "cookies":

- "necessary" - essential for the proper functioning of the service

- "statistics" - to create statistics and analyses helping to understand how users use the site, which allows optimizing its content and functionality. PRONAR uses GOOGLE tools such as Google Analytics. For more information check Google Analytics security and privacy policy.

- "marketing" – to track and collect information on the actions taken by the Users on the Portal, i.e. which links were clicked on and which pages of the Portal were visited by the User. Cookies for marketing application are collected only when the pop-up window is filled up in order to contact the user. Cookies can also be used by third parties, e.g. web portals such as Facebook, Twitter, You Tube, whose content may be placed on our website.

The legal entity that places cookies on the end - device and can access them is Pronar Sp. z o.o. and its trusted partners, i.e. entities cooperating with Pronar by providing automatic marketing services and contact possibility through the pop-up window.



By default, web browsers allow the use of cookies. The user can at any time prevent the saving of "cookies" using the settings of the web browser. Detailed information about the possibilities and ways of handling cookies are available in the web browser settings.

Disabling "cookies" does not cause an inability to use the Service, but it may cause some difficulties and make it impossible to use certain services provided within the Service.

The Website uses mainly two basic types of cookies (session cookies and persistent cookies):

Session cookies are temporary files that are stored in the user's end-device of the user until logging out (by entering another page, logging out or switching off the browser).

Persistent cookies are stored in the user's end device for a specified time that is determined in cookie parameters or until the User deletes them.

3. For using the Service, it is necessary to have a device that allows using the resources of the Internet and a web browser that allows displaying web pages.

4. By using the Service, the user accepts the principles of this privacy policy.

### §3. Collection and processing of personal data

Pronar Sp z o.o. collects and processes personal data in accordance with the relevant regulations, including in particular the GDPR, and the data processing rules provided for therein

1. The administrator and the owner of your personal data is Pronar Sp. Z o.o., with its registered office at ul. Mickiewicza 101A, 17-210 Narew, Poland, entered in the business register of the National Court Register maintained by the District Court for the City of Białystok, Commercial Division of the National Court Register, under No. KRS 0000139188, Tax Identification (NIP) No. 543-02-00-939

2. PRONAR has appointed a Data Protection Officer who may be contacted on all matters regarding personal data processing:

To contact the Data Protection Officer, please use the following contact details:

- address: PRONAR Sp. z o.o. in Narew, Mickiewicza 101a's registered address, with the annotation "Data Protection Officer"
- e-mail contact: [iod@pronar.pl](mailto:iod@pronar.pl); telephone contact: 85 6827337.

3. The Data Protection Officer ensures the transparency of the processed data, in particular by informing about the personal data processing at the time of their collection, including the purpose and legal basis of the processing. The Data Protection Officer shall ensure collecting the data only to the extent necessary for the



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indicated purpose and its processing only for the necessary period of time.

### 3.1 Purposes and legal bases of data processing

PRONAR uses data:

a) voluntarily provided by Users for:

- implementation of marketing activities including sending Pronar quarterly magazine by post
- sending e-mail notifications of interesting offers or content that may contain commercial information (newsletter service)
- telemarketing activities promoting the activities of the administrator.
- expressing willingness to participate in future recruitment processes
- organising competitions to promote the Administrator's activities.

The data are processed unless agreed upon with the user

b) in the case of actions taken for the purpose of implementing the contract:

- implement ongoing recruitment processes.
- conclusion and execution of supply, sales and order execution agreements
- activation the warranty for Pronar's equipment, service and complaint requests, machine inspection requests through the appropriate form on the website in a case of recycling machines,
- after-sales service for all products and services in the company's product range
- For Deutz, Caterpillar, Volvo engines and Kioi tractors, the administrator shall provide the above-mentioned companies with the purchasers' data for the warranty activation.

The data are processed until the contract is terminated and may then be archived if required by applicable law.

c) when the data processing is necessary to comply with legal regulations, e.g. tax, labour, social security and social protection laws. The period of data storage shall be coherent with the specific provisions.

d) where the processing constitutes a legitimate interest of the controller:

- the assertion of claims and defence against claims,
- to respond to customer inquiries, potential customers using contact forms, "Ask for an offer" or another form,
- preparation of internal market analyses and analysis of customer satisfaction with the services provided
- the need to ensure the safety of the Administrator's property by video monitoring and access control to the interiors and areas managed by the Administrator. PRONAR's administrator keeps the recordings for a period not exceeding three months unless the recording can be used as evidence in the proceedings.
- exchange of contacts and business cards in order to initiate and create a network of business contacts



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- direct marketing

The data are processed until a legitimate objection to the processing is raised.

4. Personal data are disclosed for:

- external entities, such as state authorities or entities authorized under special regulations, the Polish Post Office, couriers, banks in a need to conduct settlements,

- entities providing services to the administrator: in the field of IT systems, marketing, legal, supporting recruitment processes, distribution of marketing materials, organization of trainings, insurance services.

These entities process data on the administrator's instruction and on the basis of appropriate entrustment agreements.

5. Data owner has the right to request the Administrator for access, rectify, delete or restrict the processing of personal data as to withdraw consent for processing, as well as the right to transfer personal data.

Requests will be processed on the base of the GDPR rules,. The request should be submitted in writing to the Data Protection Inspector by letter or email to the following address: [iod@pronar.pl](mailto:iod@pronar.pl). If the Administrator is not able to identify the applicant on the basis of the submitted application, the applicant could be asked for additional information.

6. Applications should be replied within 30 days. In a term of delay, the Administrator shall inform the applicant of the reasons for the delay. A reply shall be provided by post, unless the request was made by e-mail or unless a reply was requested in this form.

7. Any person providing his or her data has the right to lodge a complaint to the President of the Office for Personal Data Protection.

8. The controller processes data in the European Economic Area and, as a rule, does not provide for their transfer to third countries. In certain situations, data may be transferred to a third country if it is necessary for the performance of an agreement between the Controller and the data subject or between the Controller and a legal or natural person in the interest of the data subject.

9. Pronar Sp. z o.o. does not process personal data in an automated way.

In regard to the possibility of Newsletter subscription by a user when visiting the website, PRONAR collects Users' IP addresses and information about the start, end and scope of the website usage, recorded in system logs. This information is used for statistical research and concerns only the IP address and period of time when the address was logged on the website, although must not be collated with any other personal data of individual Users.



#### §4. General Provisions.

1. The main aim of the Website's operation is to enable use of the information and materials placed on the Website, receipt of them by email in the form of newsletters, and assistance for interested Users in contacting the Personnel Department of PRONAR for recruitment.
2. The website may only be used according to the principles and in the scope indicated in the present Privacy Policy.
3. All intellectual property rights to the entirety and any part of the Website, including the materials and information included on it, in particular texts, navigation solutions, the choice and layout of the content presented, word marks and logos, interactive applications, audiovisual materials, compilations of materials, photographs, surveys, forms, templates and studies, constitute the property of the Website, excluding those which constitute separate property of other producers, distributors or service providers, are subject to legal protection. The same applies to all the materials which the Website makes available to Users by electronic means, and in particular by email. It is not permissible to modify, copy, distribute, pass on, display, reprint, sublicense or create collective works from the materials mentioned above, nor to send back or sell those materials, unless on the basis of appropriate permission granted by PRONAR. It is not permissible to modify, copy, distribute, pass on, display, reprint, sublicense or create collective works from the materials mentioned above, nor to send back or sell those materials, unless on the basis of appropriate permission granted by PRONAR.
4. PRONAR reserves the right to place advertising content on the Website regarding the services offered as well as goods and services of third parties, in the forms used on the internet.
5. PRONAR reserves the right to place cookies in Users' devices in order to facilitate the Users' navigation and for the proper functioning of the Website. Cookies are short text files stored by PRONAR's teleinformatic system in the User's teleinformatic system (i.e. on the hard drives of computers of persons visiting the pages of the Website) mainly for the purpose of identifying Users on the Website and gathering general information about the way the Website is used. The cookies do not contain any information connected with personal details. The User may at any time block the storage of cookies by using web browser settings. Disabling cookies does not render use of the Website impossible, but it may cause certain difficulties in this regard, and in some cases may even make it impossible to use particular services provided by the Website.





6. Use of the services of the Website requires having a device which enables use of internet resources and a web browser enabling www pages to be displayed.
7. The Website enables other systems to gather information about the User's activities on the pages of the Website for statistical purposes (e.g. Google Analytics, Gemius Traffic), advertising purposes (e.g. Google AdSense) or to offer additional functions (e.g. the "Like" button on Facebook.com), as well as to conduct an advertising campaign aimed at Users (directing adverts to remarketing lists in the Google Adwords programme).
8. Every User using the Website accepts the rules of the present privacy policy.

### §5. Gathering and processing personal details

In connection with the introduction on 25 May 2018 of the Regulation of the European Parliament and of the Council (EU) no. 2016/679 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, we hereby inform you that as of 25 May 2018 you will have the rights defined below with regard to the processing of your personal data by PRONAR sp. z o.o. with its registered office in Narew. Pursuant to art. 13 para. 1 and 2 of the Regulation of the European Parliament and of the Council (EU) no. 2016/679 of 27 April 2016, known as the General Data Protection Regulation (hereinafter GDPR), we hereby inform you that:

1. The administrator of your personal data is PRONAR sp. z o.o. with its registered office in Narew at: 17-210 Narew, ul. Mickiewicza 101A, for which the District Court in Białystok National Court Register Division keeps the registration files as number KRS: 0000139188, tax ID NIP: 543-02-00-939 (hereinafter "PRONAR").
2. PRONAR has assigned a Personal data Inspector, written contact to PRONAR sp. z o.o. in Narew, at ul. Mickiewicza 101a, 17-210 Narew; email contact: [iod@pronar.pl](mailto:iod@pronar.pl); telephone contact: 85 6827337.
3. The period during which the Administrator processes the data depends on the type of service provided and the purpose of the processing. In general, data is processed during the time the service is provided, until the consent expressed is withdrawn or cancelled, throughout the period corresponding to the expiry of claims which may be sought by the administrator or instigated against the administrator.
4. Persons providing data are entitled to demand that the Company provide them with access to data concerning them, to correct it, delete it or limit its processing, persons providing data are also entitled to object to its processing, and to transfer the data. Applications submitted will be considered in accordance



with the provisions of GDPR. The application should be submitted in writing to the Data Protection Inspector by letter or by email to [iod@pronar.pl](mailto:iod@pronar.pl)

5. Due to the fact that the data you provide will be processed pursuant to your consent, you are entitled to withdraw your consent at any moment with no effect on the legality of the processing done pursuant to your consent before it was withdrawn.
6. Persons providing their data are entitled to submit complaints to the Head of the Personal Data Protection Authority
7. The administrator processes Users' personal data in order to realise marketing operations which may involve directing email messages about interesting offers or contents, which in some cases contain commercial information (newsletter service), conducting other types of actions connected with direct marketing of goods and services (sending commercial information by email and telemarketing activities).
8. The administrator does not anticipate the use of the data for purposes other than those connected with implementing the content of the query in the contact form.
9. Personal data will not be transferred to a third country.
10. PRONAR respects the privacy of Users and protects their personal details. PRONAR takes a range of technical and organisational actions in order to protect Users' Personal Details.
11. PRONAR processes Users' Personal Details to the extent necessary to make contact with them and properly conduct the services and archiving and also for other purposes on condition that the relevant consent is obtained.
12. PRONAR is entitled to provide the Personal Details only to authorised parties pursuant to the relevant legislation, including institutions of the judiciary.
13. In connection with a User visiting a web page on which users may subscribe to the Newsletter Service, PRONAR is in possession of the IP addresses of the Users and of information concerning the beginning, end and extant of use of that page, stored in the system logs. This information is used for statistical tests and only concerns which IP address made use of a given www page and when, it is not combined with any other personal data of individual Users.

## §6. Newsletter

1. Everyone who consents to receive the Newsletter accepts the rules included in the present privacy policy.





2. Receipt of the Newsletter requires a full name and email address to be provided on the appropriate form.
3. Provision of the personal details mentioned in para. 2 above is voluntary, however failure to provide them precludes use of the Newsletter Service.
4. The data obtained in this way is added to the Newsletter mailing list. Providing data is always voluntary. Each of the registered Users of the Newsletter is entitled at any moment to change or remove their details from our data base - to do so, inform PRONAR by email at the address: [iod@pronar.pl](mailto:iod@pronar.pl) about cancellation of the Newsletter service.
5. The PRONAR Newsletter may contain links to other pages, included for the convenience and information of the user. PRONAR bears no responsibility for the information included there or the privacy policies applied

### §7. Facebook Fanpage

The administrator processes personal data of Pronar fanpage user on Facebook in order to respond to messages that are directed through the appropriate FB functionality as well as sharing posts to the user as a person following our fanpage and for the marketing purposes .

### §8. Amending the Privacy Policy

PRONAR reserves the right to change the principles and conditions for using the Services of the Website according to the Privacy Policy amendment procedure or by introducing a new regulation, particularly in the cases described below:

- a. a change in regulations made by authorised state bodies or the rulings issued which could affect the parties' rights and obligations defined by the text of the agreement
- b. a change to the technical conditions for providing the Services, including those connected with technical or technological progress,
- c. changes in the scope of the principles of internet communication caused by technological progress or a decision by the authorities, or a change in the organisational principles of the internet,
- d. as a result of events occurring due to force majeure.



## §9. Final provisions

1. The Privacy Policy comes into effect on the day it is published on the website [www.pronar.pl](http://www.pronar.pl)
2. The Regulations were published on the Website on: 20.07.2020

