



PERSONAL DATA PROTECTION POLICY (PRIVACY POLICY)

C.HARTWIG SZCZECIN INTERNATIONAL FORWARDERS Ltd.

1. On 24/05/2018, the Personal Data Protection System was introduced in C. Hartwig Szczecin International Forwarders Ltd. **(the Company)** in accordance with the 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 (General Data Protection Regulation - **GDPR**) and the relevant national rules.
2. All employees of the Company are obliged to make every effort to ensure all means of physical, technical and organizational protection of personal data against their accidental or deliberate destruction, accidental loss, alteration, unauthorized disclosure, use or access.
3. All employees of the Company are obliged to familiarize and to apply the procedures, instructions, regulations and documents regarding the protection of personal data. Every employee dealing in the processing of data has a written authorization to process personal data.
4. The Company may use the help of other companies in the processing personal data only on the basis of a written contract (so-called entrustment contract). The processing of personal data for marketing purposes - on behalf of other entities – is not executed by the Company.
5. Employees of the Company, processing personal data in the Company, as well as persons authorized to represent the Company, are obliged to apply the provisions of the GDPR. The relevant requirements are introduced into new contracts signed by the Company.
6. Personal data is stored and processed only in the period necessary to document a specific activity, including the expiration periods and other provisions concerning labor law provisions, tax law, etc. Then they are removed. Any personal data that do not meet the above requirements and are currently stored in the Company's resources must be removed.
7. Eligible requests of persons whose data is processed (the right to access, to supplement, to delete and to limit the processing of data) should always be implemented as soon as possible. Such a request should be forwarded to the Company in the written form. The claimant should be informed in writing of the fulfillment of the request. The request cannot apply to personal data that cannot be removed for legal reasons. If the data has been forwarded to other data administrators, these administrators should be informed about the request.

8. In the event of incidents of personal data breach (destruction, loss or modification of personal data, unauthorized disclosure or access to personal data sent, stored or processed in the company), the employees of the Company are obliged to immediately inform their superiors about such an event. Each of them - in accordance with applicable regulations - will be notified in a timely manner to the competent supervisory authority. At the same time, appropriate measures will be taken to eliminate / limit the consequences of such violations, as well as to inform those whose data leaked about the occurrence of such violation.

9. The system of personal data protection in the company is audited at least once a year for compliance with the provisions of the GDPR. Such audit includes: the inventory of IT resources in the Company, analysis of personal data breaches, control of data processing registers, control of physical and IT security of the stored personal data and review of external data processing agreements.

10. The Inspector of Personal Data Protection is appointed, responsible for the implementation and supervision of the Personal Data Protection System. All inquiries, comments, applications and complaints regarding the implementation of the personal data protection system and the functioning of this system in the company should be directed to the Personal Data Protection Inspector, by traditional mail: C. Hartwig Szczecin, Spedytorzy Międzynarodowi Spółka z o.o. , 71-620 Szczecin, ul. Jana Kazimierza 3, or via e-mail: iodo@hartwig.szczecin.pl.

11. The general principles of personal data processing in the Company are as follows:

11.1. THE PRINCIPLE OF THE LEGAL BASIS. Personal data can be processed only if there is a so-called legal basis for data processing e.g. explicit (written) consent of the data subject, indispensability for proper performance of contracts with a given natural or legal person, legal obligations for the administrator or pursuing goals arising from the legitimate interests of the Company.

11.2. THE PRINCIPLE OF MINIMIZING THE COLLECTED PERSONAL DATA. When collecting data, the Company is guided by the principle of "minimizing personal data". It means, the Company collects only such personal data that are necessary for the purpose of data processing (Article 5 of the GDPR). Therefore, the company has the right to collect only such personal data that are necessary to perform the tasks of the Company, both towards its own employees (to perform duties regarding employment, employee social and medicine insurance, etc.), as well as towards people outside the company (to fulfill the statutory objectives of the Company).

11.3. THE PRINCIPLES OF THE REQUIREMENT FOR VOLUNTARY, SPECIFIC, CONSCIOUS, AND UNIQUE APPROVAL TO PROCESSING OF PERSONAL DATA. In accordance with these principles, as defined in art. 6 GDP, the subject of processed data must be informed in all cases mentioned in art. 6, 12 and 13 of the GDPR, if so provided by the relevant legal provisions. The information obligations of the Company take the form of so-called agreement clause. In this respect, the Company applies the relevant regulations regarding to entities employing less than 250 persons. Such consent must have written form and is archived in the Company.

11.4. THE PRINCIPLE OF THE OBLIGATION TO ACHIEVE PERMISSION TO PROCESSING PERSONAL DATA. The consent of a specific natural person to the processing of his personal data is mandatory in all cases, except for the exclusions provided for in the GDPR Regulations. The company applies the exceptions contained in the regulations from the general principle of the consent to the processing of data in the case of, inter alia, processing of data necessary for the purposes of contract execution, required to fulfill the legal obligations of the Company and when it is necessary to perform legally justified interests by the Company or a third party (article 6.12.12 of the GDPR).

11.5. THE PRINCIPLE OF NON-PERSONAL DATA. The company does not execute the so-called profiling of personal data within the meaning of the GDPR Regulation.

11.5A. THE PRINCIPLE OF NON-TRANSFERRING OF SENSITIVE DATA. The company does not perform the so-called sensitive personal data within the meaning of the GDPR Regulations.

11.6. THE PRINCIPLE OF MINIMIZING THE PERIOD OF STORING PERSONAL DATA. Personal data in the Company are kept only in the period necessary to document a specific activity, including the expiration periods and other provisions concerning labor law provisions, tax law, etc.

11.7. THE PRINCIPLE OF CONDUCTING PRIVACY ON THE STAGE OF PLANNING ACTIONS IN THE COMPANY. At the stage of designing, planning and projecting, the Company applies the principle of privacy, i.e. at this stage, all activities leading to the effective protection of personal data are mandatory, and by default, only data that are necessary to achieve a specific purpose of processing are processed.

11.8. THE PRINCIPLE OF THE CONSULTATION WITH THE SUPERVISORY AUTHORITY. The company consults with the superior body all events listed in the legal provisions on the protection of personal data and applies to recommendations received from this body (Article 36 of the GDPR).

11.9. THE PRINCIPLE OF GRANTING THE PROCESSING PERSONAL DATA TO OTHER PARTIES ONLY IN WRITTEN FORM (Articles 28, 42 of GDPR). In the case of entrusting the processing of personal data to other entities, the Company determines a written agreement, which must comply with the requirements of the Regulation of the GDPR. The contract may be contained only with an entity that guarantees adequate protection of personal data. In the first place, such contracts should be signed with entities possessing the appropriate certificate.

11.10. THE PRINCIPLE OF THE COMPLIANCE WITH THE RIGHTS OF PERSONS WHOSE PERSONAL DATA ARE PROCESSED. The company complies with all rights that the procedure of the GDPR introduces for persons whose data is processed, including the right to be forgotten (Article 17 of the GDPR, national provisions). In particular, the company respects the right to requesting for the deletion of personal data by the data subject and the right to requesting for be forgotten by other administrators to whom the personal data of the requesting person has been transferred. In accordance with the requirements of the GDPR Regulation, the right to transfer personal data will be applied at the request of a given person. Any consent to the processing of personal data is also revocable.