



# Privacy policy

SATEL Sp. z o.o.

**PRIVACY POLICY****SATEL Sp. z o.o.** (hereinafter: SATEL)**INFORMATION ON PERSONAL DATA PROCESSING****I. General information**

1. This Privacy Policy (hereinafter: **Policy**) provides information on to what extent, how and for what purposes SATEL processes the personal data of: customers, contractors, their representatives and staff, persons participating in SATEL training courses, using SATEL service or technical support, performing repairs, contacting SATEL, participating in SATEL events, visiting SATEL profiles in social networks, using SATEL websites and web services, subscribing to SATEL newsletters.
2. Personal data will be processed in accordance with the applicable legal provisions, in particular the provisions of 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: **GDPR**).
3. The controller of personal data is **SATEL sp. z o.o.** with its registered office at ul. Budowlanych 66 in Gdańsk (postcode 80-298), registered in the register of entrepreneurs kept by the District Court Gdańsk-Północ in Gdańsk, 7th Commercial Division of the National Court Register under the KRS number 0000178400, NIP number: 5840154038, REGON number: 19297638000000, with the share capital of PLN 1,830,000 (fully paid up), BDO register number: 000006416 which has appointed the **Personal Data Protection Officer** ([iodo@satel.pl](mailto:iodo@satel.pl), phone no. 58 320 94 27, ext. 377).
4. This Policy fulfils the information obligation referred to in *Articles 13 and 14 of the GDPR*.

**II. Rights of the data subject**

1. The data subject has the right to request from the Controller access to his/her personal data, its rectification, erasure or restriction of processing, and the right to data portability.
2. The data subject has the right to object at any time, on grounds relating to his/her particular situation, to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller (*Art. 6(1)(f) of the GDPR*). If an objection is lodged, the data is processed until the objection is upheld.
3. Where personal data is processed for the purposes of direct marketing, the data subject will have the right to object at any time to the processing of personal data concerning him/her for the purposes of such marketing, including profiling, to the extent that the processing is related to such direct marketing.
4. In respect of processing by SATEL on the basis of consent, the data subject has the right to withdraw his/her consent at any time without affecting the lawfulness of the processing carried out on the basis of such consent before its withdrawal.
5. If the data subject considers that his/her right to the protection of personal data has been violated, he/she has the right to lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warszawa, Poland), [www.uodo.gov.pl](http://www.uodo.gov.pl).
6. Any notifications or requests concerning the processing of personal data can be submitted to the Data Protection Officer, appointed by SATEL, by email [iodo@satel.pl](mailto:iodo@satel.pl), by telephone 58 320 94 27 ext. 377 or by letter to the address: SATEL sp. z o.o., ul. Budowlanych 66, 80-298 Gdańsk, Poland, with the note "Data Protection Officer". SATEL will immediately provide information on the actions taken.

### III. Purpose of personal data processing, legal basis, type of data, data storage period

#### ENTERING INTO AND PERFORMANCE OF A CONTRACT WITH A DATA SUBJECT

Data of persons concluding contracts with SATEL (placing orders) – customers, contractors.

Purpose of processing:

- entering into and performing a contract (*legal basis: Article 6(1)(b) of the GDPR*)
- performance of the controller's legal obligations under the contract, in particular with regard to tax and accounting obligations (*legal basis: Article 6(1)(c) of the GDPR*);
- in order to pursue the legitimate interest of the controller, i.e. for documentation purposes, to assert or establish claims or to defend against contract-related claims (*legal basis: Article 6(1)(f) of the GDPR*).

The data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller – according to Section II of this Policy.

Type of data: name, surname, business name, contact details (address, email address, telephone number), NIP number, REGON number, and other data provided in connection with the contract.

The personal data will be stored for the duration of the contract and until the statute of limitations for any claims and public liabilities (including tax liabilities) under the law relating to the contract has expired.

#### ENTERING INTO AND PERFORMANCE OF A CONTRACT WITH ANOTHER ENTITY (e.g. the data subject's employer)

Personal data of other persons provided to SATEL by a SATEL contractor in connection with entering into or performing a contract with the contractor (placing an order), e.g. persons representing the contractor, contact persons.

Purpose of processing:

- the fulfilment of the controller's legitimate interest, i.e. to ensure the communication necessary for the performance of the contract concluded between the contractor and the controller, to identify the persons who conclude and perform it, to assert or establish claims or defend against claims arising out of that contract and for documentation purposes (*legal basis: Article 6(1)(f) of the GDPR*).

The data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller – according to Section II of this Policy.

Type of data: name and surname, contact details (business telephone number, business email address), role or official position.

Personal data will be stored for the duration of the contract between the contractor and the controller, and for the purpose of defending against or asserting potential claims until the statute of limitations for any claims under the law relating to that contract has expired.

#### SERVICE, TECHNICAL SUPPORT, REPAIRS

Data of persons using the service or technical support provided by SATEL, submitting a complaint, performing warranty and post-warranty repairs at SATEL.

Information regarding the processing of personal data in the event of the use of the service or technical support through the SATEL Support Service ([support.satel.pl](https://support.satel.pl)) is available in the Regulations for the SATEL Support Service.

Purpose of processing:

- the provision of service and support, the processing of complaints and the performance of warranty and post-warranty repairs,
- establishing, pursuing or defending against claims under the law relating to the service or repair, i.e. the legitimate interest of the controller (*legal basis: Article 6(1)(f) of the GDPR*).

The data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller – according to Section II of this Policy.

Type of data: name, surname, position, name of the entity represented, contact details (address, email address, telephone number), data provided in the claim or complaint.

The data will be stored for the duration of the service/technical support or the performance of the repair, and for the purpose of defending against or asserting possible claims – until the statute of limitations for any claims under the law relating to the repair in question has expired.

## **CONTACT WITH SATEL**

Data of persons contacting SATEL by post, email, contact forms, telephone, etc.

Purpose of processing:

- contact and communication using contact forms, email, telephone or otherwise, including making offers, answering questions, asking questions, scheduling meetings
- establishing and maintaining relationships within the business activity,
- asserting or defending possible claims, i.e. the legitimate interest of the controller  
*(legal basis: Article 6(1)(f) of the GDPR).*

The data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller – according to Section II of this Policy.

Type of data: name, surname, position, name of the entity represented, contact details (address, email address, telephone number), other data provided at the time of contact.

The data will be stored for the duration of the relationship (not less than 12 months of the last contact) and, in the event of the assertion or defence of related claims, until the statute of limitations for such claims has expired.

If you contact us using the „Cooperate with us” form on the SATEL bewave.systems website, the following data will additionally be processed: city, province/country (export), type of activity. Data may be transferred to entities cooperating with SATEL in the area of distribution.

If contact is made using a form prepared for specific events (e.g., trade fairs), the data may be entrusted to providers of tools used to establish contact (e.g., meeting scheduling forms), in particular Calendly LLC, 115 E. Main Street, Suite A1B, Buford, GA, 30518, USA, who process it on behalf of SATEL.

## **NEWSLETTER**

Data of persons receiving a newsletter from SATEL (excluding the newsletter specified in the SATEL Support Service Regulations or other SATEL regulations where this is expressly stated).

Purpose of processing:

- sending SATEL newsletters to the provided email address with the consent of the data subject  
*(legal basis: Article 6(1)(a) of the GDPR).*

Giving consent to the processing of personal data is completely voluntary.

The data subject has the right to withdraw their consent at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Type of data: first name, last name, email address, IP.

The data shall be processed for the duration of the newsletter provision, until SATEL opts out of providing the newsletter and, in any case, until a declaration of opting out of the newsletter is submitted (withdrawal of consent).

## EVENTS

Data of persons participating in events organised by SATEL.

Purpose of processing:

- organisation and promotion of SATEL events (e.g. conferences, promotional meetings),
- contact with participants in connection with the event, i.e. the legitimate interest of the controller

*(legal basis: Article 6(1)(f) of the GDPR)*

The data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller – according to Section II of this Policy.

Type of data: name, surname, position, name of the represented entity, contact details (address, email address, telephone number), other data necessary for participation in the event (e.g. selected type of accommodation, individual wishes, type of diet, date of arrival/departure, type of transport).

Personal data may be transferred to entities cooperating with SATEL in the implementation of the event, e.g. co-organisers of the event, entities providing accommodation and catering to participants.

The data will be stored for the duration of the organisation and implementation of the event, and for the purpose of defending against or asserting potential claims until the statute of limitations for any claims under the law relating to the event has expired.

## SOCIAL MEDIA

Personal data of visitors, followers, subscribers or commentators on SATEL profiles within LinkedIn, YouTube, Vimeo, Facebook, Instagram.

Purpose of processing:

- marketing the SATEL brand, products and services,
- carrying out communication and promotion as part of the profile on the site / channel on the service,
- analysis and statistics,
- communication – in the case of contacting SATEL via the site,
- asserting or defending possible claims, i.e. the legitimate interest of the controller

*(legal basis: Article 6(1)(f) of the GDPR).*

The data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of the legitimate interest of the controller – according to Section II of this Policy.

Type of data: user name on the site, name and surname, nickname, image, information available in the person's profile/public account, any information he/she makes publicly available and information provided in messages or comments, statistical data.

Personal data will be processed by SATEL until such data is deleted (e.g. deletion of information in a person's public profile) or until SATEL's profile is removed from the respective social network and in accordance with the functionalities of the respective services, and in the case of asserting or defending claims – until their statute of limitations has expired.

If SATEL is requested to delete data, the request will be fulfilled in accordance with the functionalities of the respective site.

Data may be transferred to:

- controllers of social networks on which SATEL maintains its profiles/channels, under the terms of their privacy policies;
- persons who visit SATEL profiles/channels on social networks (e.g. data of a person posting a comment on a profile on a social network).

In addition, the controllers of the specified social networks process personal data for their own purposes in accordance with their regulations and privacy policies:

- **LinkedIn** – LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland – in the case of the site users in the European Economic Area and Switzerland: <https://www.linkedin.com/legal/privacy-policy>
- **Facebook** – Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; <https://www.facebook.com/privacy/center>
- **Instagram** – Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; <https://www.facebook.com/privacy/center>  
<https://www.facebook.com/help/instagram/155833707900388>
- **YouTube** – Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland – in the case of the site users in the European Economic Area and Switzerland; <https://policies.google.com/privacy?hl=en>
- **Vimeo** – Vimeo.com, Inc., 330 West 34th Street, 5th Floor, New York, New York 10001, in the case of the site users in the European Economic Area: the local representative – RA Robert Niedermeier, DATA BUSINESS SERVICES GmbH & CO KG-Germany, Noerdliche Muenchner Str 47, 82031 Gruenwald/Munich, Germany; <https://vimeo.com/privacy>

Social networks may transfer data to third countries in accordance with their policies under the provisions of the GDPR.

SATEL has access to anonymous statistical data generated by the controllers of social networks concerning SATEL profiles and the users who visit them.

SATEL controls jointly the data with social network controllers for statistical and analytical purposes.

### **LinkedIn Ireland Unlimited Company – applicable to LinkedIn**

LinkedIn Ireland Unlimited Company provides SATEL with the so-called page statistics when a user visits, follows or interacts with the SATEL profile (website) on LinkedIn. LinkedIn Ireland Unlimited Company processes, among other things, data provided to it by the user, such as position, country, industry, seniority, company size, and employment status data from the user's profile, as well as information about how the user interacts with the profile, such as whether the user is a follower. LinkedIn Ireland Unlimited Company processes and stores personal data for the purposes of website statistics in accordance with its user agreement and LinkedIn's Privacy Policy.

The website statistics made available to SATEL consist of aggregated data and regardless of the joint controller status, LinkedIn does not provide SATEL with personal data in relation to the website statistics (profile) nor will it make it possible for SATEL to link the website statistics to individual persons.

LinkedIn is responsible for providing website statistics and complies with all applicable obligations under the GDPR in relation to the processing of website statistics (including, but not limited to, fulfilling information obligations in relation to users, ensuring the exercise of data subjects' rights, ensuring appropriate technical and organisational measures to ensure data security).

SATEL is responsible for complying with all obligations under the GDPR in relation to the SATEL's use of the website statistics, i.e. it has an appropriate legal basis for processing such data (**Art. 6(1)(f) of the GDPR**) and fulfils the information obligation with regard to the processing purposes pursued by SATEL.

The data subject can exercise his/her rights in the LinkedIn account settings or by contacting LinkedIn directly.

The main supervisory authority for the joint processing of data is the Irish Data Protection Commission.

Detailed information is available at:

<https://legal.linkedin.com/pages-joint-controller-addendum>

<https://security.linkedin.com/>

<https://www.linkedin.com/help/linkedin/answer/a550358?lang=en>

## Meta Platforms Ireland Limited – applicable to Facebook

SATEL and Meta Platforms Ireland Limited are joint controllers of data in respect of data processing for statistical and advertising purposes. Joint control includes the aggregate data analysis for the display of statistics on user activity on the SATEL profile on Facebook.

The extent of Meta Platforms Ireland Limited's responsibility for processing data for the specified purposes:

- possession of a legal basis for the processing of data for website statistics;
- ensuring that the rights of data subjects are fulfilled;
- reporting violations to the supervisory authority and notifying persons affected of the incident;
- providing appropriate technical and organisational measures to ensure data security.

The extent of SATEL's responsibility for data processing:

- possession of a legal basis for the processing of data for statistical purposes (*i.e. Article 6(1)(f) of the GDPR*);
- fulfilling of information obligations with regard to the purposes of the processing carried out by SATEL.

Meta Platforms Ireland Limited will make the main content of the website statistics annex available to data subjects via the data contained in the publicly available Website Statistics Information.

The main supervisory authority for the joint processing of data is the Irish Data Protection Commission (*notwithstanding the provisions of Article 55(2) of the GDPR*, where applicable).

Detailed information is available at:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

<https://www.facebook.com/privacy/explanation>

## SATEL WEBSITES AND WEB SERVICES

Other information regarding the processing of data of persons using SATEL websites and web services is available in a separate [Cookies Policy](#).

Information regarding the processing of data of persons using the SATEL Support Service ([support.satel.pl](https://support.satel.pl)) can also be found in the Regulations for the SATEL Support Service.

## IV. Consequences of refusal to provide data

- 1.** In the case of a contract, the provision of data is a contractual requirement or a condition for the conclusion of the contract, and failure to provide such data prevents the conclusion or performance of the contract.
- 2.** In the case of the issuing of an invoice/bill, the provision of data is a statutory requirement and the obligation arises from mandatory legal provisions, i.e. the Goods and Services Tax Act, the Personal Income Tax Act, and accounting regulations.
- 3.** In other cases, the provision of personal data is voluntary, but failure to provide this data will prevent the achievement of the purposes for which the data is processed. For example, the provision of personal data to register for an event organised by SATEL is voluntary, but necessary to attend the event.
- 4.** The provision of data within the SATEL profiles in social networks for the purpose of communication and promotion is voluntary and occurs through the use of the respective profile, e.g. by posting reactions or comments.

## V. Data source

- 1.** Data may be provided to SATEL directly by the data subject, e.g. a person who contacts SATEL provides his/her data necessary for contact.
- 2.** Data may be provided to SATEL by another entity, e.g. in the case of enrolling an employee by the employer to participate in an event organised by SATEL or providing data of a contractor's associate as a contact person in connection with a contract concluded with SATEL.

## VI. Data recipients

In addition to the recipients specified in the Policy, personal data may be transferred (disclosed) to:

- entities providing services to the controller and its subcontractors (including entities operating IT systems used for the implementation of the controller's activities, providing accounting, postal, courier, archiving, or legal services);
- bodies entitled to receive data under the provisions of law.

## VII. Transfers of data to third countries

As part of the use of third-party service providers by SATEL, e.g. for analytical, statistical, advertising, contact purposes, personal data may be transferred to third countries (countries outside the European Economic Area) on the basis of standard contractual clauses and, in the case of transfer to a country covered by a decision of the European Commission declaring an adequate level of protection, on the basis of this decision. A copy of the security information can be obtained from the SATEL Data Protection Officer (contact details are provided in Section I of this Policy).

## VIII. Profiling, automated decision-making

Data of persons using SATEL websites and SATEL sites obtained using cookies and other similar technologies may be subject to profiling and automated decision-making in order to send personalised SATEL marketing messages. Information obtained using cookies and similar technologies is not combined with other user data, nor is it used to identify users by SATEL. Detailed information on the marketing tools used by SATEL and the possibility of resigning from these tools is available in the [Cookies Policy](#).

The data subject has the right to object at any time to profiling for direct marketing purposes – according to Section II of this Policy.

## IX. Final provisions

SATEL may amend this Privacy Policy by publishing a new Privacy Policy, in particular in the event of changes to the rules or scope of personal data processing covered by the Policy or changes to the applicable provisions of law concerning personal data protection.