



TRANSITION
TECHNOLOGIES

Public

Privacy Policy

§ 1 Definitions

The terms used in this privacy policy have the following meanings:

- a) **Data Controller** – an entity deciding on the nature, scope and purposes of personal data processing – Transition Technologies PSC S.A. with its registered office in Łódź, at 276 Piotrkowska St., 90-361 Łódź, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Łódź Śródmieście in Łódź, XX Commercial Division of the National Court Register under number 0000930989, Tax ID Number 7292712388, Statistical ID Number: 365249538, share capital in the amount of PLN 1,468,800.00, paid in full;
- b) **Cookies** – means IT data, in particular small text files, saved and stored on devices through which the User uses the Services available on the Website. A detailed description of the cookies used can be found in the Cookies Policy, at [Cookies Policy](#)
- c) **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 (General Data Protection Regulation);
- d) **Website** – a website managed and maintained by the Service Provider at <https://tppsc.com/en/>
- e) **User** – an adult natural person using the Website.

§ 2 Data Controller

- a) The Data Controller of data collected during the use of the Website is Transition Technologies PSC S.A.
- b) Contact with the Data Controller is possible via:
 - 1. Postal address: Transition Technologies PSC S.A. 276 Piotrkowska St., 90-361 Łódź;
 - 2. Email address: contact@tppsc.com;
 - 3. phone number: [+48 661 799 553](tel:+48661799553);
 - 4. Data Protection Officer: gdpr@tppsc.com;

§ 3 Purpose of the Privacy Policy

Please be advised that the principles contained in the Privacy Policy are intended to ensure adequate protection of the data collected by the Data Controller, including personal data, and apply in each case when you use the Data Controller 's Website as well as in any other case when you contact the Data Controller.

The Data Controller declares that in its current activity it uses and selects the tools with the utmost care, the latest technical knowledge and the principles of professional excellence, with the aim of protecting personal data and other information obtained from the User.

§ 4 Data collected

- a) In the course of using the Website, the following data is collected: IP addresses or other identifiers and information collected through cookies or other similar technologies.
- b) When a User fills out forms available on our website or signs up for the Services we offer, we collect data that is then provided to us, such as:
 - 1. name
 - 2. surname
 - 3. company name
 - 4. email address/business email address
 - 5. country
 - 6. business phone number
 - 7. position

The exact data needed to use specific Services or processed in connection with specific processes are described in the [Regulation for the provision of electronic services](#) or in the relevant [GDPR clause](#).

- c) Persons visiting the Data Controller 's Website may browse it without providing personal data referred to in section 2 above.
- d) The rules for collecting data in connection with the use of cookies are described in detail in a separate document – Cookies Policy, which can be found at <https://ttpsc.com/en/cookies-policy/>.

§ 5 Purpose and legal basis of data processing

The data collected are used:

- a. for the provision of certain Services, where the basis for processing is the consent of the data subject, which he or she has given for one or more specified purposes (legal basis Article 6. 1 .a GDPR);
- b. for the provision of certain Services, on the basis that the processing is necessary for the performance of a contract or to take action at the request of the data subject prior to entering into a contract (legal basis Article 6. 1. b GDPR);
- c. when the processing is necessary for the fulfilment of a legal obligation owed to the Data Controller (Article 6. 1. c GDPR);
- d. when processing is necessary for purposes arising from the legitimate interests pursued by the Data Controller (Article 6. 1. f GDPR) such as:
 - 1. marketing purposes, including sending commercial information to an email address based on the Data Controller's legitimate interest in marketing its own services and promoting the brand;

2. for statistical and technical purposes, related to the administration of the Site on the basis of the Data Controller's legitimate interest, which is to ensure the proper operation of the Website, its updating and adaptation to the needs of Users;
3. in order to maintain the Data Controller's profiles maintained in social media (e.g. LinkedIn, Facebook) on the basis of the Data Controller's legitimate interest, which is to inform Users about the Data Controller's activities, promote events, services and products;
4. in order to establish and enforce possible claims on the basis of the Data Controller's justified interest, which is the protection of the Data Controller's rights.

The exact information on what data is needed to use specific Services or on what legal basis it is processed in connection with specific processes is described in [Regulation for the provision of electronic services](#) or in the relevant [GDPR clause](#). Providing personal data is voluntary, however, it is necessary to perform the Services or complete the Forms.

§ 6 Rights and obligations of the User in connection with the processing of personal data

- a) By providing data, the User is obliged to indicate complete, current and true data.
- b) The User should not provide the Data Controller with personal data of third parties. If, however, they provide such data, they declare each time that they have the appropriate consent of third parties to transfer data to the Data Controller.
- c) Each User whose personal data is processed by the Data Controller has the right to:
 1. access to the content of their data,
 2. rectify them,
 3. delete them,
 4. restrict their processing,
 5. transfer data,
 6. object to the processing of data,
 7. if the processing is based on Article 6.1.a of the GDPR or Article 9.2.a of the GDPR – the right to withdraw consent at any time, without affecting the legality of the processing carried out on the basis of consent before its withdrawal.
- d) The exercise of the rights specified in the section above may be carried out by sending the relevant request with the name and email address of the user to the Data Controller 's email address: gdpr@tppsc.com.

- e) In addition, the User has the right to lodge a complaint with the supervisory body – the President of the Office for Personal Data Protection (address: 2 Stawki St., 00-193 Warsaw), if they consider that the processing of their personal data violates the provisions of the GDPR.

§ 7 Do we transfer personal data and to whom?

- a) The data may be made available to entities authorized to receive them under applicable law, including competent judicial authorities.
- b) Personal data may be transferred to entities processing them at the request of the Data Controller, i.e., partners providing technical services (development and maintenance of IT systems and websites), entities providing accounting services, or companies from the capital group. The exact information on to whom specific data can be transferred is described in the relevant [GDPR clause](#).

§ 8 Transfer of data outside the European Economic Area

As the Data Controller operates internationally, it may be necessary to transfer your personal data outside the European Economic Area, in particular to companies from the capital group. Due to the fact that entities located outside the European Economic Area do not always ensure a level of personal data protection that meets European standards, in a situation where the transfer of your data turns out to be necessary, the Data Controller shall implement appropriate solutions to protect your rights and freedoms.

The transfer shall take place on the basis of safeguards permitted under the GDPR, i.e.:

- a) to a country for which the European Commission has issued a decision on an adequate level of security in the area of personal data protection (Article 45.1 of the GDPR), or
- b) using standard contractual clauses referred to in Article 46.2.c of the GDPR.

§ 9 Security of data collected by the Data Controller

- a) The Data Controller has applied all technical and organizational measures to ensure the protection of processed personal data appropriate to the threats and categories of data protected, and in particular secured the data against unauthorized access, removal by an unauthorized person, processing in violation of regulations and change, loss, damage or destruction, in accordance with the provisions of the GDPR.
- b) Personal data shall not be processed in an automated manner by the Data Controller.
- c) After the end of the processing period, the data are irreversibly deleted or anonymized.

§ 10 Duration of personal data retention

- a) The data shall be stored only for the period necessary to achieve the purpose for which they were collected, and after its expiry, for the period necessary to secure or pursue possible claims or fulfill the

Data Controller's legal obligation (e.g., resulting from tax or accounting regulations). Details are given in the relevant information clauses.

- b) Personal data processed for the purpose of the Data Controller's legitimate interest consisting in the marketing of own products or services shall be stored for the period until the User objects.

§ 11 Information clauses

Information on the processing of personal data, depending on the nature of the relationship between the User and the Data Controller, has been presented in accordance with Article 13 or 14 of the GDPR in the relevant information clauses, which are available at: <https://ttpsc.com/en/gdpr/>.

§ 12 Final provisions

- a) The Website may contain links to websites of other entities. The Data Controller has no influence on the privacy policy of their websites conducted by these entities and is not responsible for it. When going to a third-party website, Users should familiarize themselves with the data protection rules applied by the Data Controller of the website.
- b) The Privacy Policy is verified and updated on an ongoing basis.
- c) The current version of the Privacy Policy entered into force on 30 of October 2023.