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PRIVACY POLICY OF TELS GROUP OF COMPANIES

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1. Field of Application

This Privacy Policy (hereinafter – Policy) was developed according to the requirements of the regulations of the European Parliament and Council of the European Union N 2016/679 dated 27.04.2016 “On the protection of individuals with regard to the processing of personal data and the free movement of such data” (hereinafter – GDPR), in order to inform broad public, personnel of the Group of companies, customers and business partners of the character, scope and designation of personal data, which we collect, use and process, and also of the relevant rights.

Group of companies TELS includes the following legal entities:

No	Name of the legal entity	Information of the legal entity
1	TELS CZ spol. s r.o.	155 00 Praha 5, Jinonice, Česká republika ul. Pekařská 621 e-mail: tels@telsgroup.cz Tel: +420 226 259 799; Fax: +420 235 311 311 Společnost zapsaná v OR Městského soudu v Praze pod sp. zn. C 131196 IČ: 28182499, DIČ: CZ28182499 ŘEDITEL SIARHEI KAVALCHUK
2	TELS Polska Sp. z o. o.	03-717, Warszawa, Polska, ul. Kłopotowskiego, 22 e-mail: tels-pl@telsgroup.pl Tel: + 48 22 517 90 00; Fax: + 48 22 517 90 10 Sąd Rejonowy dla m. st. Warszawy XIII Wydział Gospodarczy KRS Nr KRS: 0000262036 Kapitał zakładowy 50.000 PLN NIP 1132624028, REGON 140617479 PREZES ZARZĄDU GRIGORY VOLIK

№	Name of the legal entity	Information of the legal entity
3	T.E.L.S. Transeuropean Logistic Services Limited	N12 8NP, England, London, 289/297 Ballards Lane, Rowlandson House, office 116 Company No. 04303303, VAT No. GB 989803158 Tel.: +44 20 83 43 9650 Director IGOR LEVIN
4	TELS UKRAINE LLC	04112, Ukraine, Kiyv, Rizka Street, building 8A, office 403 e-mail: tels-ua@telsgroup.com.ua Tel.: + 380 44 454 72 31 Fax: + 380 44 454 72 30 TIN 356251926592 Director General STASEVICH DMITRO VASILYEVICH
5	TELS-RUS LLC	125130 Moscow, Staropetrovskiy Lane, house 7A, building 25, entrance 3, floor 3, room 1 e-mail: tels-rus@telsgroup.ru Tel.: +7 495 134 43 81, Fax: +7 495 134 03 66 TIN 7743253068, Tax Registration Reason Code 774301001, Principle State Registration Number 1187746423260 Director General SADOVSKIY SERGEY ANTONOVICH
6	TELS Logistic LLC	127015, Moscow, Novodmitrovskaya Street, house 2, block 1, premise LXIII room 3 e-mail: tels-logistic@telsgroup.ru Tel.: +7 495 134 43 84, Fax: +7 495 134 03 66 TIN 7733767307, Tax Registration Reason Code 771501001 Principle State Registration Number 1117746368300 Director General VELMA MAXIM ALEKSANDROVICH
7	TELS CARGO LLC	214533 Smolensk region, Smolensk district, Olsha village, territory to the north-east of the village, 300 m, room 206 e-mail: tels-cargo@telsgroup.ru Telephone: +7 4812 268 328, Fax: +7 4812 268 329 TIN 7743632718, Tax Registration Reason Code 671401001 Principle State Registration Number 1077746701504 Director General ABRAGIMOVICH ANDREI PETROVICH
8	TELS CARGO LINE LLC	214533 Smolensk region, Smolensk district, building within the territory to the north-east of Olsha village, 300 m, room 209 e-mail: tels-cargo@telsgroup.ru Tel. +7 4812 268 491, fax +7 4812 268 490 TIN 7743897658 Tax Registration Reason Code 671401001 Principle State Registration Number 1137746734399 Director General PCHELKO VLADIMIR GRIGORYEVICH
9	T.E.L.S.-BY LLC	220090, Republic of Belarus, Minsk, Logoiskiy Trakt, house 22A, premise 77, office unit 2 e-mail: tels-by@telsgroup.by Tel.: +375 17 352 49 31, Fax: +375 17 355 49 35 TIN 190500189, General Classifier of Enterprises and Organizations 37626875 Director SAMUSEV IVAN NIKOLAYEVICH
10	ART LOGISTIC LLC	220090, Republic of Belarus, Minsk, Logoiskiy Trakt, house 22A, premise 78, office unit 6

№	Name of the legal entity	Information of the legal entity
		e-mail: art-logistic@telsgroup.by Tel.: + 375 17 357 49 33, Fax: + 375 17 356 49 34 TIN 190804946, General Classifier of Enterprises and Organizations 377132035000 Director GERMANOVICH OLEG VIKENTYEVICH

The present Policy regulates the following information:

- Which personal data (hereinafter – PD) are collected, where from and by which technical means;
- For which reasons GROUP OF COMPANIES TELS collect PD;
- Whom the PD may be transferred to, including while interacting with third parties;
- How long the PD are stored;
- How cookies files are used in the GROUP OF COMPANIES;
- How the PD owners can gain access to them, check their accuracy and, if necessary, correct them or state their willingness to delete them;
- Which protection measures for PD protection from possible unlawful use or unauthorized access have been taken;
- Who you can address if you have questions or complaints.

GROUP OF COMPANIES reserves the right to amend the present Policy without preliminary notification by publishing it on their sites in a new edition.

2. Normative References

For application of the present document the following documents are necessary, for which the references are made:

General Data	EU Regulation 2016/679 dated April 27, 2016.
Protection Regulation	
ISO/IEC 27000:2016	Information technology. Security techniques. Information security management systems. Overview and vocabulary
ISO/IEC 27001:2013	Information technology. Security techniques. Information security management systems. Requirements
	Internal documentation Information Security Management System of the Group of companies

3. Terms and Definitions

3.1. Personal Data – any information, which allows identifying an individual.

3.2. PD Party – any identified or identifiable individual, whose personal data are processed by a controller responsible for processing.

3.3. PD Processing – any transaction or a set of transactions performed with personal data, whether automated or not, for example: collection, recording, organization, structuration, storage, adaptation, amendment, search, consulting, usage, disclosing by transfer, distribution, deletion or destruction.

3.4. Profiling – any form of automated personal data processing, connected with the usage of personal data for evaluation of certain personal aspects in regard of the individual, particularly: for their analysis or prognostication, connected with the performance of work, with economic situation, health, personal preferences, interests,

reliability, behavior, place of residence or change of the place of residence of the individual.

3.5. Pseudonymization – personal data processing in such a way that the data cannot be related to a certain data subject without the use of additional information, provided that such additional information is kept separately with a corresponding technical and organizational system ensuring that such personal data are not related to such individual.

3.6. Controller or controller responsible for processing – an individual or an entity, which independently or together with other parties determines the reasons for personal data processing and the order of their processing.

3.7. Operator of Processor – an individual or an entity, which processes personal data on behalf of the data controller.

Group of companies combines the functions of a Controller and a Processor.

3.8. Receiver – an individual or an entity, which discloses personal information irrespective of whether it is a third party.

State authorities, which can receive personal data within a certain investigation according to the legislation, are not considered to be receivers.

3.9. Third Party – an individual or an entity, which is not a data subject, a controller, a processor or party authorized to process personal data under direct supervision of a Controller or a Processor.

3.10. Consent of the data subject is a freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

3.11. Cookies are small files that websites of the group of companies or service providers of the group of companies (partner companies Google™, Yandex™, the scripts of which are embedded to the websites of the group of companies) send to the memory of the device, from which the PD subject gains access to the websites through a browser (if the settings allow that).

4. Information on Personal Data Collected and Processed by the Group of Companies

The group of companies collects and processes different types of PD depending on the service or a product, which the current or future customers of the group of companies, potential or current employees, partners are interested in, based on the requirements of the legislation according to the reasons mentioned in the clause 5 of the present Policy, in the strict minimum essential scope and only within the term when it's reasonably required.

4.1. Collected PD

4.4.1. Main PD, collected within the activities of the group of companies:

- Identification number;
- Surname, name, patronymic;
- Day, month, year of birth;
- Information of the place of birth;
- Digital portrait photograph;
- Data on citizenship (allegiance);
- Data on registration at the place of residence and (or) place of stay.

4.4.2. Additional PD, collected within the activities of the group of companies:

- Data on parents, guardians, custodians, family status, spouse, child (children) of the individual;
- Data on higher education, degree, academic title;
- Data on tax obligations;
- Information on the performance of military service;
- Phone number.

The provision of the PD by the subjects is voluntary and well-realized.

4.4.3. PD, which the group of companies receives from other sources:

- Data of CRM system;
- Messages received by e-mail, by feedback forms on websites, in chats, messengers, messages in social networks;
- Data of geolocation of the PD subject with the use of GPS;
- E-mail address; IP address; fax number;
- Address of business/office (street, house number, office number, postal index, location, country);
- Name of the company the PD subjects is employed by;
- Position of the PD subject;
- Identifier in Skype or any other messenger with possibility to make voice and video calls.

The present list of PD is not final and may be added as may be necessary according to the needs of the group of companies in coordination with the PD subject.

4.4.4. PD collected through online services:

- PD collected through websites with the following domain names: "telsgroup.ru", "telsgroup.com", "telsgroup.pl", "telsgroup.cz", "telsgroup.by", with "www" or without it, including sub-domains and other sites administrated by TELS group of companies);
- PD collected through mobile services, blogs and applications, polling and data collection forms, means of news, advertising or other mailout.

During each visit of the above-mentioned websites of the group of companies cookies are used (detailed information is mentioned in the clause 8 of the present Policy) and other similar technologies. Also the group of companies collects information on the device (including its IP address), from which the access to the online recourses of the group of companies is made, data from the server logs during website use.

During filling-in the forms on websites of the group of companies information is collected which the DP subject inputs to the corresponding fields, after the Send button is pressed. As a rule PD mentioned in the clause 4.4.3 (except CRM data) of the present Policy are collected through forms on the websites of the group of companies. The storage time of such data and the reasons for it are mentioned in clause 7 and 5 of the present Policy.

Usage of the above-mentioned websites is possible without providing personal data.

4.2. PD Processing

During PD processing the group of companies does not use profiling and pseudonymization.

If the PD processing is necessary and there is no legal basis for such processing, we receive the PD subject's consent to fulfill requirements of article 1 and 6 of GDPR.

According to clause 42 of the recitals of GDPR, for consent to be informed, the data subject should be aware at least of the identity of the controller and the purposes of the PD processing (see the reasons in clause 5 of the present Policy).

The condition of extinction of PD processing may be achieving goals of PD processing, expiration of the consent or withdrawal of the PD subject's consent to his/her PD processing and also discovery of illegal PD processing.

5. Reasons for DP

The group of companies processes legally collected PD within clearly formulated reasons, which are characteristic of the interaction of the group of companies in different internal processes with the following interested parties:

- Customers, potential customers, their representatives;
- Contractors and partners (existing as well as potential);
- Employees (including their relatives) and applicants.

In order to establish business cooperation with the group of companies the interested parties must provide certain PD for the group of companies to fulfill the obligations in realization of logistic and other services according to the relevant legislation, organizational and local documents of ISMS of the group of companies.

In consideration of the foregoing it is necessary to take in consideration that if the group of companies receives a refusal to provision of certain PD, the group of companies retains the right to terminate business relations.

Goals, legal ground for the processing and storage terms for personal data according to clauses 39, 59 of GDPR are provided in the table.

Goal of PD processing	Legal ground	Storage time for PD or criteria for determination of such terms
Performance of actions to prepare for the contract; signing and performance of the contract between the group of companies and the contractor, including current cooperation with the contractor and parties designated for the contract; provision of cost of the service or of any other information, calculated upon your request; Informing of the process of service rendering and possible changes	clause b of sub-paragraph 1 of article 6 of GDPR (performance of a contract to which the data subject is party) or clause f of sub-paragraph 1 of article 6 of GDPR (legitimate interests pursued by the controller in the performance of the contract signed with the with the contractor)	Period necessary for the contract to be performed
Filing and responding to contract-related claims	clause f of sub-paragraph 1 of article 6 of GDPR (legitimate interests pursued by the controller)	Time limitation for filing claims
Saving from the need to prove facts	clause f of sub-paragraph 1 of article 6 of GDPR (legitimate interests pursued by the controller)	Time limitation for filing claims
Maintenance of accounting and tax documentation	clause c of sub-paragraph 1 of article 6 of GDPR (legal obligation to which the controller is subject)	Storage period for accounting and tax documentation
Implementation of marketing activities, including: sending of commercial offers, information on shares and events, study of preferences and interests; For internal analysis and development of products, research of satisfaction of contractors; responses to your messages, determination of the quality of our services	clause f of sub-paragraph 1 of article 6 of GDPR (legitimate interests pursued by the controller, for example direct marketing) or clause a of sub-paragraph 1 of article 6 of GDPR (consent of	During the period required to achieve the purpose, but not more than before an objection to the personal data processing for that purpose or the withdrawal of consent

Goal of PD processing	Legal ground	Storage time for PD or criteria for determination of such terms
<p>and the level of customer satisfaction with products and services, for communication purposes;</p> <p>Improvement of Internet resources as well as the services and information provided through them; sales support (loyalty program),</p> <p>Business card - for sales and communication;</p> <p>Photobank, employee photos;</p> <p>Email signature;</p> <p>To contact you on the substance of your requests - responses to requests to support service, sending requested information and a newsletter or other information</p>	<p>the data subject to his or her personal data processing)</p>	
<p>Summary during personnel search and selection;</p> <p>Registration of employment relations;</p> <p>If the employment agreement (contract) is not concluded with the employee, documents and applications are automatically removed</p>	<p>clause c of sub-paragraph 1 of article 6 of GDPR (legal obligation of the controller)</p>	<p>Period of employment relations and the terms established by the legislation of the country of collection of information for storage of certain documents after the termination of employment relations</p>

During visit of the websites of the group of companies, mentioned in the section 4.4.4. of the present Policy, we process a limited scope of data (cookies and other similar technologies with the use of such instruments as Google™, Yandex™ and 1C-Bitrix™) during filling-in of relevant forms on those sites for the following purposes:

- Approximate calculation of the delivery cost and insurance;
- Collection of reviews and recommendations from interested parties;
- Provision to interested parties possibility to contact customer service or any other specialists;
- Provision to interested parties possibility to subscribe the newsletter or any other subscription (we use MailChimp™ to manage the newsletters);
- Collection of responses of the interested parties to the available vacancies;
- Provision to interested parties a possibility to request a callback from a specialist concerning the points of interest;
- Enabling interested parties to offer their own transport;
- Other purposes related to offering services of the group of companies, expanding their list, as well as collecting information about their quality, including using social networks and instant messaging facilities (messengers).

Group of companies does not collect the PD of minors through the Internet resources listed in clause 4.3. of the Policy, also group of companies does not work purposefully with children or children's content (clause 38 of the Recitals, Article 8 of GDPR).

Group of companies cooperates with third parties (such as Google™ and Yandex™, social networks, instant messaging tools and applications with support of media files and

calls) to re-market and offer visitors of online sites of the group of companies advertising, based on previous actions of visitors on the global network.

6. Access to Personal Data during Interaction with Third Parties

In order to organize coordinated interaction and to receive a prompt result the group of companies transfers PD to the employees of structural divisions of the group of companies in accordance with the location or territory, where the services are provided by the interested party or based on the business function of a legal entity, which is a member of the group of companies, involved in the relevant business processes for prompt, regulatory or reporting purposes, e.g. to verify new customers, to comply with applicable laws, to ensure security of IT systems or provide and/or documentation of logistics and/or other services (in accordance with clause 110 of the Recitals of GDPR).

The PD are not leased, sold or transferred to third parties without obtaining the consent of the PD subject.

Group of companies is obliged to disclose the PD at the request of the relevant public authorities - investigative, tax authorities, militia, police, prosecutor's office, customs control authorities, financial investigation units, independent administrative authorities or financial market authorities, responsible for regulating and supervision of securities markets should not be regarded as recipients if they receive PD which are necessary to carry out a particular research.

A request for DP disclosure sent by the public authorities should always be in writing, reasoned and occasional and should not concern the entirety of a filing system or lead to the interconnection of filing systems.

The PD processing by those public authorities should comply with the applicable standards for the PD protection according to the purposes of processing (clause 31 of the Recitals of GDPR).

In case of non-execution or improper execution of obligations by the PD subject according to the legislation or the contractual relations the group of companies transfers PD to attorneys, lawyers when collecting debts, to the crisis managers at implementation of the bankruptcy procedure, to notaries due to the need of protection of legitimate rights and the interests of the group of companies.

In all these cases the group of companies guarantees that third parties can access only those PD that are necessary for specific tasks.

According to clause 101 of the Recitals of GDPR, the transfer of PD to third countries as well as from third countries for the expansion of international trade and international cooperation (cross-border transfer) can only be carried out in full compliance with the provisions of GDPR and the laws of the country where they are present.

Group of companies may provide access to PD to partner companies, which include hosting providers and other entities, which assist group of companies in the administration and improvement of Internet sites or help to improve user experience when using Internet sites, assist in the administration of e-mailing or in the administration of advertising of services as long as such partner companies agree not to disclose the received PD, to take sufficient measures to protect them, and to offer its services in accordance with this Policy, or under conditions that allow a greater level of confidentiality, protection and transparency for the subject of the PD.

7. PD Storage

Duration of PD storage depends on the purpose for which the group of companies processes them. The PD will be stored as long as there is an agreement between group

of companies and the PD subject or as far as it is necessary for the group of companies to fulfill fiscal and legal obligations.

The period during which the PD is stored is limited to a strict minimum, and is only processed if the processing objective cannot be otherwise achieved. In order to ensure that PD are not stored longer than expected, the group of companies has established deadlines for their destruction or for periodic revision in accordance with clause 39 of the Recitals of GDPR.

The time limits for a PD category are specified in the table 5 of the present Policy.

If a PD subject contacts us via email or contact form, the PD provided by the PD subject are automatically stored for processing or contact with the PD subject only for a short time on our email server in encrypted form.

Due to the use of third party services, as well as legal requirements of some regions the PD of subjects, in the absence of an expressed legal prohibition and the existence of a technical and/or administrative or legislative necessity, may be stored on servers located in the territory of any state at the discretion of the group of companies or as required by the relevant legislation.

In such case the employees and partners of the group of companies will do their best to achieve the following:

- All necessary measures to protect your data and prevent unauthorized persons from accessing it are taken,
- or
- Legal requirements for processing of personal data in the country where they are stored meet the requirements for the processing of personal data in the country of their origin.

8. Cookies Usage

Cookies allow Internet site systems of the group of companies or services of partner companies of the group of companies in the future to identify the browser of the PD

subject when re-accessing the Internet sites or services of partner companies, as well as to remember certain information about the preferences of the PD subject.

Group of companies uses cookies to improve the level of comfort of the PD subject when using Internet resources.

In particular, cookies are used by the group of companies for the following:

- Collection and storage of data sent by PD subjects via appropriate forms on the Internet sites of the group of companies;
- Understanding and remembering user preferences for future visits of websites by the group of companies;
- Collection of data on visits to the sites of the group of companies and interaction of users in order to further improve the services provided and introduce new solutions into Internet sites in the future.

Group of companies may use services for cookies processing provided by trusted third parties acting for the benefit of the group of companies.

The PD subject may configure the browser it uses to access Internet sites in such a way as to receive notifications of sending (receiving) cookies or to disable such sending (receiving).

Note: The presence or absence of such options, as well as their activation, may be found by PD subject in the settings or in the Help section of their browser.

If the use of cookies is disabled in browser settings, it will not affect the availability of services and services received through websites of the group of companies.

PD subjects can at any time prevent cookies from being posted through the website of the group of companies by configuring their browser. Besides, cookies can be deleted at any time using a web browser or other specialized software.

9. Granting the Parties Access to Their Personal Data and Its Management

According to articles 15-18 of GDPR, as well as clauses 59 and 66 of the Recitals of GDPR, a PD subject has the following rights during the process of their PD processing by the group of companies:

- Right to access data

You may obtain confirmation from us that we process your personal data, in which case you are entitled:

- a) to gain access to your personal data;
- b) to obtain information on processing purposes, categories of personal data to be processed, recipients or categories of recipients of such data, the planned storage period of your data, or the criteria for defining this period, your rights under GDPR and the right to file a complaint with the supervisory body, the source of this data, automated decision-making, including profiling, and precautionary measures used in connection with the transmission of such data outside the European Union;
- c) receive a copy of your personal data

- Right to correct data

You are entitled to correct and supplement your personal information. You can do this by yourself on the Settings tab (Confidentiality). As for other personal data, you have the right to require that we correct this data (if it is incorrect) and supplement it (if it is incomplete)

- Right to delete data ("right to be forgotten")

You are entitled to request the deletion of all or some personal information. You may request the deletion of personal data if:

- a) you have withdrawn a specific consent to the extent that personal data have been processed on the basis of your consent;

- b) your personal data are no longer necessary for the purposes for which they were collected or processed;
- c) you have objected to using your data for marketing purposes;
- d) you have objected to the use of your data for the purpose of maintaining website usage statistics, satisfaction surveys and the objection was found to be justified;
- e) your personal data is being processed illegally.

Despite the request to delete personal data, in connection with an objection or withdrawal of consent, we may keep certain personal data to the extent necessary for the purposes of establishing, reviewing or protecting claims. This applies in particular to personal data, including: name, email address and application history, which we store for the purposes of handling complaints and claims related to the use of our services.

- The right to object to the use of data (in accordance with clause 70 of the Recitals of GDPR).

You may at any time object to the use of your personal data, including profiling, if we process your data on the basis of our legitimate interests, for example in connection with statistics on the use of selected website functionality and the ease of use of the website, as well as satisfaction surveys. If your objection proves to be valid and we have no other legal basis for processing your personal data, we will delete your data to which you objected. If the PD subject has objected to the processing of their PD for direct marketing purposes, the processing of the PD for this purpose shall be terminated (in accordance with Part 3 of Article 21 of GDPR);

- The right to limit data processing

You may request a limitation on the processing of your personal data. If you submit such a request, we will not allow you to use certain features or services that will include processing the data covered by the request until it is processed. We will also not send you messages, including marketing messages.

You may request a limitation on the use of your personal information in the following cases:

- a) when you doubt the correctness of your personal data - then we will limit their use to the period we need to verify the correctness of your data, but not longer than 7 days;
- b) when processing your data is illegal, and instead of deleting the data you request restriction of its use;
- c) when your personal data is no longer needed for the purposes for which we collected or used them, but you need them to establish, approve or protect claims;
- d) when you object to the use of your data - then there is a time limit to consider whether protecting your interests, rights and freedoms due to your particular situation is superior to the interests we exercise in processing your personal data

- The right to data portability

You are entitled to receive your personal information that you have provided to us and then send it to another personal data controller of your choice, such as another similar service operator. You also have the right to require that we transfer personal data directly to another controller, if it's technically possible. We will send your personal data as a file in a commonly used machine readable format that allows you sending the received data to another personal data controller;

- Withdraw consent to the collection, processing and transfer of PD, except where the PD are processed under the law or other grounds other than consent. This means that the PD subject cases can at any time withdraw their consent to processing at any time. As soon as the group of companies is notified that the PD subject has withdrawn their consent, the group of companies will no longer process them for purposes to which the PD subject originally consented unless the group of companies has other legal grounds for doing so;

- File a complaint with the supervisory authorities of the host countries
If you find that the processing of personal data violates GDPR or other provisions relating to the personal data protection, you may file a complaint with the President of the Office of Personal Data Protection:

Urząd Ochrony Danych Osobowych (Office of Personal Data Protection)

ul. Stawki 2

00-193 **Warsaw**

Tel. +48 22 531 03 00

Fax +48 22 531 03 01

e-mail: kancelaria@uodo.gov.pl; zwme@uodo.gov.pl

Website: <https://uodo.gov.pl/>

Member: Mr. Yan NOVAK, president of the Department of Personal Data Protection

United Kingdom

Information commissioner

Water Water Lane, Wycliffe House

Wilmslow - Cheshire SK9 5AF

Tel. +44 1625 545 700

e-mail: casework@ico.org.uk

Website: <https://ico.org.uk>

Member: Mrs. Elizabeth DENHAM, information commissioner

Czech Republic

Department of Personal Data Protection

Pplk. Sochora 27

170 00 Prague 7

Tel. +420 234 665 111

Fax +420 234 665 444

e-mail: posta@uouu.cz

Website: <http://www.uouu.cz/>

Member: Mrs. Ivana JANU, president

When do we execute your query? If, in exercising the above-mentioned rights, you contact us, we shall execute this query or refuse to execute it immediately, but not later than one month after its receipt. However, if - due to the complexity of the query or the number of queries - we are unable to satisfy your query within a month, we will complete it within the next two months by informing you in advance of the proposed renewal. For technical reasons, we always need 24 hours to update the settings you have selected on our systems. Consequently, it may happen that you will receive an email from us during the update of the system you have unsubscribed from.

The PD subject may at any time contact a data protection employee of the group of companies, specified in item 11 of this Policy, or another employee of the group of companies and exercise their rights.

Group of companies guarantees observance of the rights of PD subjects mentioned above.

10. Protective Measures for Personal Data used by the Group of Companies

During the PD processing the group of companies guarantees their safety, security and confidentiality, as well as access to information about this processing by those persons who are connected with the PD and prevention of access to them by unauthorized persons.

Group of companies shall endeavour to ensure the security of the PD, including ensuring that the legal requirements for the processing of the PD in the country of storage meet the requirements for the processing of the PD in the country of origin (art. 32 of GDPR).

The processing of the PD with the use of the electronic software is carried out using Secure Sockets Layer (SSL) cryptographic protocol, which provides protection of the identifying PD by unauthorized systems or persons.

To ensure the entirety and confidentiality of the data of the group of companies:

- Implemented procedures ensuring access to PD only by authorized persons and only to the extent necessary to perform tasks;
- Applies organizational and technical solutions to ensure that all PD transactions are registered and are only performed by authorized persons;
- Takes the necessary steps to ensure that subcontractors and other persons cooperating with the group of companies provide appropriate security measures when processing the PD;
- Performs risk analysis and monitors the adequacy of applied protection of PD against real threats;
- All computer systems, electronic databases of the group of computers are scanned for malicious code or unauthorized access to the PD
- Performs regular internal control over compliance with the Policy;
- Organizes the application of technical measures: access mode, security, application of security means.

In the group of companies, among other things, separate storage of the collected PD is implemented and ensured. Depending on their purpose, in some cases PD are not stored on the servers of the group of companies, but are located on servers of partner companies providing e-mail collection, processing and administration services, visit and site usage analytics.

The used measures help to protect the PD from illegal or accidental access, removal, modification, blocking, copying, distribution and other unlawful actions of third parties.

All PD are stored in DPC ("Data-processing center") on the servers, which are territorially located in the country of the territory of the European Union. The company providing such services guarantees compliance with GDPR requirements.

In case, despite the use of protective means, there will be a violation of PD protection (E.g. data leakage or loss or signs that may even indirectly indicate unauthorized access to personal data), the group of companies follows the provisions of GDPR and notifies the supervisory authorities of such event within 72 hours after detection of such leakage, and informs the PD subject in accordance with the rules of GDPR (according to clauses 85-89 of the Recitals of GDPR, Art. 33 and Art. 34 of GDPR).

11. Contact Details

If questions arise regarding the PD processing and the rights of PD subjects to file complaints, you can contact us by sending an appeal to PersonalDataProcessing@telsgroup.com