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## I. Introduction

In order to ensure your right to privacy and security of your personal data, we provide you with information on the purpose and principles of processing of your personal data by us and your rights in this regard.

In accordance with Article 13 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 (General Data Protection Regulation), (hereinafter referred to as "GDPR"), we hereby inform you that:

## II. Controller

The Controller of your personal data (hereinafter referred to as "Controller") is Sulima, Grabowska, Sierzputowska Biuro Patentów i Znaków Towarowych sp.k., with its registered seat in Warsaw (02-670), ul. Puławska 182, represented by General Partners:

Mrs. Małgorzata Grabowska and Mrs. Iwona Sierzputowska.

The Controller may be contacted as follows:

- by mail: Sulima, Grabowska, Sierzputowska Biuro Patentów i Znaków Towarowych sp.k., skr. poczt. 6, 00-956 Warszawa 10
- by phone: tel.: +48 (22) 825 82 41, fax: +48 (22) 825 77 82
- by e-mail: [sulima@sulima-patent.pl](mailto:sulima@sulima-patent.pl)

## III. Data Protection Officer

The Company's Data Protection Officer (hereinafter referred to as "DPO") is Mrs. Joanna Majewska-Poławska.

In all matters concerning the processing of your personal data and the exercise of your rights related to the processing, you can contact the Data Protection Officer by e-mail at [iodo@sulima-patent.pl](mailto:iodo@sulima-patent.pl) or by letter sent to Sulima, Grabowska, Sierzputowska Biuro Patentów i Znaków Towarowych sp.k., skr. poczt. 6, 00-956 Warszawa 10, with the note "Data Protection Officer".



## IV. Purposes and periods of data processing

Purpose of data processing	Legal basis	Explanation of purpose	Data processing period
<b>Taking steps to execute orders or conclude and perform a contract:</b>	Article 6(1)(b) of the GDPR	In order to file applications for industrial property rights on your behalf, enforce intellectual property rights and conduct proceedings before national, EU, international and foreign authorities and courts.	Until a contract or any action that may result from an commissioned order is completed, and thereafter, for other lawful purposes related to a contract or an order, for the periods specified in applicable laws. Then, personal data obtained for the indicated purpose will be deleted or anonymised and archived.
	Article 6(1)(f) of the GDPR	In order to contact your employees/associates in connection with the actions related to the conclusion/performance of a contract or the execution of an order.	Until a contract or any action that may result from an commissioned order is completed, and thereafter, for other lawful purposes related to a contract or an order, for the periods specified in applicable laws. Then, personal data obtained for the indicated purpose will be deleted or anonymised and archived.
<b>Compliance with legal obligations</b> resulting in particular but not exclusively from:	Article 6(1)(c) of the GDPR in connection with the Act of 30 June 2000 on Industrial Property Law (consolidated text: Journal of Laws of 2020, item 286)	In order to comply with the statutory obligations of patent attorneys in connection with the cases.	Until a contract or any action that may result from an commissioned order is completed, and thereafter, for other lawful purposes related to a contract or an order, for the periods specified in applicable laws. Then, personal data obtained for the indicated purpose will be deleted or anonymised and archived.
	Article 6(1)(c) of the GDPR in connection with the Act of 11 March 2004 on Goods and Services Tax (consolidated text: Journal of Laws of 2020, item 106)	In order to issue invoices for our services, keep accounts and do financial reporting.	Until the data processing obligations arising under applicable laws expire, in particular until the retention of accounting documents expires (as a rule, for 5 years after the year in which the legal event that required the issue of an accounting document occurred).
	Article 6(1)(c) of the GDPR in connection with the Act of 23 April 1964 on Civil Code (consolidated text: Journal of Laws of 2019, item 1145)	In order to comply with the obligations related to the conclusion of contracts and execution of commissioned tasks.	Until the period of limitation for claims arising from a contract or an order being executed expires - in accordance with applicable laws.
	Article 6(1)(c) of the GDPR in connection with the Act of 26 June 1974 on Labour Code (consolidated text: Journal of Laws of 2019, item 1040)	In order to comply with the obligations related to employment.	In accordance with applicable laws obliging to archive labour law documents, i.e. for 50 years or 10 years, respectively.
<b>Determination, investigation and defence of claims</b>	Article 6(1)(f) of the GDPR	Data processing of customers or contractors and their employees/associates in connection with the determination, investigation and defence of claims.	Until the period of limitation for claims arising from a contract or an order being executed expires - in accordance with applicable laws.
<b>Responding to inquiries, including all quotation inquiries</b>	Article 6(1)(f) of the GDPR	In order to maintain good relations with current or potential customers or contractors, take steps to conclude contracts, acquire customers, clarify doubts and provide any information to those making inquiries to us.	For a period of 3 months from the termination of correspondence, except where a contract is concluded/an order is commissioned, or where any dispute arises between us and the party making an enquiry (then the points and periods specified above will apply).



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Personal data are processed by us for the entire duration of a relation to which they relate, for the periods specified in the relevant laws and no longer than 10 years after the termination of a relation established or the completion of any actions that may result from an order commissioned or a contract concluded, while after 5 years, the data are transferred to the archive with access for specifically authorised persons only and are kept for evidence purposes for further 5 years.

Providing data referred to above is voluntary, but necessary in order to properly carry out the tasks commissioned by you or to establish cooperation. Therefore, failure to provide data may result in the impossibility of cooperation or completion of an order.

**Your data are not used for automated decision-making (profiling). Also, we do not conduct direct marketing.**

**Your data are not passed on to other parties for marketing purposes.**

Any information on current recruitments and personal data processing in connection with the recruitment process can be found in our advertisements placed on websites: [pracuj.pl](http://pracuj.pl), [gumtree.pl](http://gumtree.pl) and [olx.pl](http://olx.pl) and in the Cooperation section on our website. **Please be informed that all CVs sent to [sulima@sulima-patent.pl](mailto:sulima@sulima-patent.pl) or [sulima@sulima-trademark.pl](mailto:sulima@sulima-trademark.pl) will be deleted without reading.**

## **V. Data categories**

The categories of personal data processed by us belong to ordinary data, including personal data of our customers and contractors and their employees, provided directly by you or on your behalf, and any data provided to us in the course of ongoing cases, as well as personal data concerning our employees and associates.

## **VI. Data Recipients**

The recipients of your personal data are our authorised employees and associates as well as domestic and foreign entities supporting us in our activities.

The recipients to whom your personal data may be passed on may be parties and participants in proceedings or authorities competent under the law to handle matters that will be conducted by us.

Personal data may be transferred to public entities in accordance with applicable laws and to international organisations and EU authorities in accordance with applicable national laws and international agreements.

## **VII. Transfer of personal data**

Due to the nature of an order you have entrusted us with, personal data received from you may, to the extent necessary, also be transferred to other entities involved in the case, established within or, where appropriate, **outside the European Union**, about which we will inform you each time by e-mail or on request by letter.

## **VIII. Your rights**

In accordance with applicable laws, every person whose personal data is processed by us has the right to:



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- **access** their data (also to obtain a copy, to have the data rectified (corrected)), **deleted, transferred or to restrict their processing;**
- **withdraw consent to the processing** - where the legal basis for personal data processing is consent (Article 6(1)(a) or Article 9(2)(a) of the GDPR) - without affecting the lawfulness of the processing we have carried out based on consent before its withdrawal;
- **object to the processing** - in such a case, if there are no valid legal grounds or if the data are not necessary for any possible determination, investigation or defence of claims, we will cease the processing.

If you believe that we are processing your data in breach of applicable law, please contact the Data Protection Officer to clarify any doubts you may have in this respect.

You also have the **right to lodge a complaint with the President of the Polish Data Protection Authority** if you believe that the processing of your personal data violates the provisions of the GDPR.

#### **IX. Information subject to change**

We reserve the right to change the above data protection information by publishing new information on our website.

In the name of:

**SULIMA, GRABOWSKA, SIERZPUTOWSKA**  
**Patent and Trademark Attorneys**

*Małgorzata Grabowska*  
*General Partner*

*Iwona Sierzputowska*  
*General Partner*