

## **Personal Data Protection and Information Obligation**

Data Controller – PANEK S.A., Grójecka Street 208, 02-390 Warsaw.

1. To ensure the integrity, availability, and confidentiality of personal data, the Controller has implemented procedures that allow access to personal data only to authorized persons and only to the extent necessary to perform their official duties. The Controller applies organizational and technical solutions to ensure secure and lawful processing of personal data.

### 2. Data Controller

According to art. 13 par. 1 and 2 of the Regulation of the European Parliament and the Council (EU) 2016/679 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"), we inform you that the Controller of your personal data is PANEK S.A., based in Warsaw, Grójecka Street 208, 02-390 Warsaw.

### 3. Contact to Data Controller:

<b>Communication Channel</b>	<b>Car Rental (www.ipanek.pl)</b>	<b>Car Sharing (www.panekcs.pl)</b>
<b>Email</b>	bok@panek.eu	bok@panekcs.pl
<b>Correspondence Address</b>	PANEK S.A., Grójecka Street 208, 02-390 Warsaw	PANEK S.A., Grójecka Street 208, 02-390 Warsaw

4. You may contact the Data Protection Officer of PANEK S.A. through the following communication channels:

<b>Name and Surname</b>	Łukasz Onysyk
<b>Correspondence Address</b>	PANEK S.A., Grójecka Street 208,

02-390 Warsaw,  
with a note "DPO"

**Email** iodo@panek.eu

5. While providing our services, we collect the following personal data:

**Car Rental ([www.ipanek.pl](http://www.ipanek.pl))**

**Car Sharing ([www.panekcs.pl](http://www.panekcs.pl))**

Name(s) and Surname

Name(s) and Surname

PESEL number

PESEL number

Date of birth

Date of birth

Gender

Gender

Phone number

Phone number

Email address

Email address

Residence address

Residence address

Place and date of birth

Place and date of birth

Driving license number and validity date

ID document number

ID document number

Geolocation data

Geolocation data

Company name and address

Company name and address

NIP number

NIP number

Credit/debit card validity date

Credit/debit card validity date

Image and front side of the driving license

Location of the customer's mobile device when the app is actively running (not in the background)

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6. PANEK S.A. processes your personal data for the purposes of:

- Conclusion and execution of a contract/contracts with PANEK S.A. in accordance with art. 6 par. 1 point b) and c) GDPR in connection with art. 70 par. 1 of the Tax Ordinance Act – for the period necessary to conclude the contract, no longer than 5 years from the end of the calendar year in which the tax obligation arising from the contract was established.
  - Ongoing communication and sending responses to your inquiries, questions, and reports in accordance with art. 6 par. 1 point f) GDPR, where the legally justified interest lies in ongoing communication with clients – for the period necessary to respond to the inquiry, question, and report.
  - Proper service by PANEK S.A., including resolving your matters electronically, through contact on the communicator on the website or on social media as well as by telephone in accordance with Art. 6(1)(f) GDPR, where the legally justified interest lies in the proper service of the client – for the period necessary to provide information through electronic contact;
  - Consideration of complaints in accordance with Art. 6(1)(f) GDPR, where the legally justified aim of the administrator is the consideration of complaints – for the period necessary to consider the submitted complaint;
  - Sending marketing and commercial information from business partners via email, SMS, MMS, or in a mobile application (e.g., “push” notifications) in accordance with Art. 6(1)(f) GDPR – where the legally justified interest of the administrator is the marketing of products and services of business partners, until you effectively submit an objection under the principles defined in Art. 21 GDPR;
  - Marketing of goods and services of PANEK S.A. and satisfaction research with provided services in accordance with Art. 6(1)(f) GDPR where the legally justified interest of the administrator is the marketing of its products and services – until you effectively submit an objection under the principles defined in Art. 21 GDPR;
  - Sending newsletters in accordance with Art. 6(1)(f) GDPR, where the legally justified interest of the administrator is the marketing of its products and services – until you effectively submit an objection under the principles defined in Art. 21 GDPR;
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- If you consent to receive marketing communications to your email address, the legal basis will also be Art. 10 of the Act of July 18, 2002, on providing services by electronic means, and if for this purpose you provide us with your phone number or telephone (push notifications), then Art. 172 of the Act of July 16, 2004 – Telecommunications Law – until the user withdraws separate and voluntary consent expressed for this purpose;
  - Conducting contests on social media in accordance with Art. 6(1)(f) GDPR is the legally justified interest of the administrator is the organization, conduct of the contest, enabling participants to participate in the contest – until you effectively submit an objection under the principles defined in Art. 21 GDPR, no longer than for a period of 5 years from the end of the calendar year in which a tax obligation arose in the event that as a result of the contest and obtaining a prize within it, possessing a material value;
  - Conducting operational activities of PANEK S.A. (e.g., analysis, reports, statistics, verification of payment credibility, etc.) in accordance with Art. 6(1)(f) GDPR – no longer than the period necessary to verify payment credibility, prepare an analysis, report, or statistic;
  - Realization of a legally justified interest pursued by the Administrator, through processing of geolocation data and route of the rented vehicle while using the application by the User, aimed at securing the property belonging to the Administrator in case of its loss, appropriation, or theft, as well as verifying the proper execution of the contract by the User and pursuing claims or defense against claims, in accordance with Art. 6(1)(f) GDPR – for the duration of the contract concluded by the User with the Administrator, no longer than for a period of 18 months from the date of collecting data for this purpose;
  - Adjustment of messages, promotions, discounts, and other marketing content of PANEK S.A. to the needs of the User based on the analysis of User behavior in the Services and the movement of Users within the use of the Service (analysis of the location of the mobile device). Based on available data, content tailored to their preferences or tastes may be presented to Users, in accordance with Art. 6(1)(a) GDPR – until the User withdraws separate and voluntary consent expressed for this purpose.
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- Establishment, defense, and pursuit of claims in accordance with Art. 6(1)(f) GDPR – for a period no longer than 3 years from the day the claim became due;
- Verification of the correctness of account creation in the Service based on the User's image in accordance with Art. 6(1)(f) GDPR for a period of 30 days from the creation of the account in the Service.
- Fulfillment of legal obligations resting on PANEK S.A. arising from other legal provisions (e.g., providing information to authorities entitled to request them, fulfilling court orders, etc.), in accordance with Art. 6(1)(c) GDPR in connection with Art. 15(1), (2), and (3) of the Act of June 6, 1997, Code of Criminal Procedure (Journal of Laws of 2021, item 534) – for the period necessary to fulfill the legal obligation incumbent on the Administrator.

7. PANEK S.A., in the scope of applications for using the offered services, uses the following functionalities:

GPS Location, through:

- Starting the execution of the service.
- Estimating the ride cost based on the analysis of the distance traveled by the User.
- Indicating the nearest vehicle to ensure high quality of service and adapt the service to the User's needs, by determining the User's position on the map.
- Analyzing the movement of Users within the use of the Service (analysis of the mobile device's location) for marketing purposes of PANEK S.A. or Partners of PANEK S.A. (with the User's consent).

User's Camera, with their consent, through:

- User registration for the purpose of identity verification and possession of rights to operate mechanical vehicles.
- Directing reports and complaints of mechanical damage caused by the User or found at the stage of initiating the service.

8. PANEK S.A. will share your personal data with other recipients to whom the processing of personal data has been entrusted on behalf and for PANEK S.A.

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9. Recipients of your personal data may include:

- Authorized persons and entities providing services for the business operations of the Controller (employees, collaborators, business partners, service providers, especially in the IT sector, etc.)
- Authorized state bodies and other institutions under applicable laws
- Economic information bureaus
- Debt purchasers

10. PANEK S.A. does not transfer data outside the EEA, but if necessary, we will apply the necessary level of protection in accordance with Chapter V of the GDPR.

11. In cases where PANEK S.A. processes personal data based on a justified interest of PANEK S.A., personal data will be processed until the legitimate interest in processing personal data for a specific purpose persists. However, data will not be processed if the customer raises a justified objection to such processing, and PANEK S.A. does not demonstrate the existence of valid legally justified reasons for processing or grounds for establishing, pursuing, or defending claims.

12. If PANEK S.A. processes personal data:

- Based on customer consent – personal data will be processed until the consent is withdrawn. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.
- In connection with cookie technology – personal data will be processed until these files are deleted using browser settings or other devices by the User.

13. PANEK S.A. will store your data only for the time necessary to achieve the individual purposes specified in point 6 above and for the periods indicated there. The data processing period may be extended if required by legal provisions. After the processing period, data is irreversibly deleted or anonymized.

14. PANEK S.A. ceases processing personal data if you submit a justified objection to such processing, and the Data Controller does not demonstrate the existence of important legally justified reasons for processing or grounds for establishing, pursuing, or defending claims.

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15. If within 30 days from the moment of providing data during registration on the Website the User does not complete the registration, the data will be irreversibly deleted or anonymized.

16. Providing your personal data is voluntary but necessary to achieve the aforementioned purposes.

17. You have the right to:

- Access your data and receive a copy of it according to art. 15 GDPR
- Correct your data according to art. 16 GDPR
- Delete your data according to art. 17 GDPR
- Limit the processing of your data according to art. 18 GDPR
- Transfer your data according to art. 20 GDPR
- Object to the processing of data according to art. 21 GDPR

You also have the right to lodge a complaint with the supervisory authority UODO, Stawki Street 2, Warsaw

18. If personal data is processed for direct marketing purposes, the person to whom the data pertains has the right to object at any time to the processing of their personal data for such marketing, including profiling, to the extent that the processing is related to such direct marketing.

19. Profiling

- We inform you that as Panek S.A., we may profile the user through the verification of speed, driving style, use of the handbrake, and the usage of our cars. We aim to ensure the safety of our users and road traffic participants. Upon exceeding the speed limit, you may receive a message from us regarding safe driving. Processing data is necessary for the proper realization of the service as well as to ensure safety. The rights and all necessary information regarding the processing of personal data are described in this privacy policy. In case of additional questions, you can contact DPO at [iodo@panek.eu](mailto:iodo@panek.eu).
  - In certain situations, PANEK S.A. uses automated decision-making processes so that the User receives messages, promotions, discounts, and other marketing content tailored to their needs. For this purpose, PANEK S.A. analyzes the behavior
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of Users on the Websites and their movement while using the Service (mobile device location analysis). Based on available data, content tailored to their preferences or likes can be presented to the User. The decision to present the appropriate content is made automatically. Processing of personal data within this profiling and making content available to Users occurs with their explicit consent, which can be revoked at any time.

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