**We support the development of our clients ensuring data security in the digital world**

|  |
| --- |
| **GDPR - INFORMATION OBLIGATION**Based on Article. 13 par. 1 and par. 2 and art. 14 par. 1 and par. 2 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 95/56/EC (hereinafter: "GDPR" ) which shall come into force on May 25th, 2018, we inform you about the manner and purpose in which we process your personal data (hereinafter referred to as "data"), as well as your rights related to data protection |
| **Who is responsible for data processing?** | NASK S.A. based in Warszawie, ul. 11 Listopada 23, 03-446 Warszawa; KRS: 0000644422, NIP: 9512421815, REGON: 365743505, tel. +48 22182 00 00; e-mail: kontakt@nasksa.pl |
| **Responsible for data processing:** | Data Protection Officer / Controller can be contacted: 1. in writing, by sending correspondence to the following address: ul. 11 Listopada 23, 03-446 Warszawa;
2. by e-mail, at: iod@nasksa.pl;
3. c) by phone, at the number: +48 882 362331
 |
| **Legal basis**  |

|  |
| --- |
| It is considered that Article 6 in articles of association of NASK S.A in connection with Article 6 of GDPR 1 constitutes the appropriate legal basis for personal data processing.The processing of personal data occurs for the following purposes: 1. activity in the field of: a) telecommunications, b) ICT, c) IT, d) cybersecurity, e) operational framework of Polish Internet domain registration system, f) Information Society, g) computer simulation and modelling of processes and systems, h) e-authentication and digital signature, i) biometrics and security systems, j) semantic techniques, k) e-learning and lifelong learning, l) document flow management, m) accessibility of information for people with visual disabilities, n) multimodal human-machine interfaces, o) security of ICT and T systems, p) programming and data processing within clusters, grids, cloud computing;
2. security activity in the field of systems security;
3. implementation of results of scientific research and development works delivered within needs of security and public order authorities, state security and security of critical infrastructure units;
4. organisation of courses and scientific conferences, including business, scientific, technical courses;
5. ensuring cybersecurity to public entities within scope commissioned by supervising minister and indicated by other public administration entities;
6. supporting efforts towards Information Society development and conducting research on safe usage of computer networks;
7. fostering and supporting efforts towards creation, development and maintenance of ICT systems.
 |

 |
| **Why,** **to what purpose****and on what legal basis** **do** **we process your data?** | We process your data in accordance with the provisions of the GDPR and Polish data protection regulations. We do this in particular in order to:1. If your explicit consent is given for the processing of your data, the legal ground for this processing is set out in Art. 6 (1) (a) of the GDPR;
2. If your personal data is processed for the purpose of contract performance, the legal ground for this processing is set out in Art. 6 (1) (b) of the GDPR;
3. The legal ground for all other cases (especially when using a contact form) is set out in Art. 6 (1) (f) of the GDPR;
4. You have the right to object at any time to the processing of data which was performed according to Article 6 (1)(f) of GDPR and which does not serve direct marketing for reasons arising from your particular situation.In the case of direct marketing, however, you may object to the processing at any time without stating any reasons.

Consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of data processing by NAS S.A. until the consent is withdrawn or in circumstances where NASK S.A. processes data based on a different legal basis than your consent. |
| **Who can we transfer data to?** | The data may be made available to other recipients in order to perform the contract concluded with you, in order to comply with the legal obligation imposed on NASK S.A., based on your consent or for the purposes resulting from the legitimate interests pursued by NASK S.A. or a third party.The recipients can be, in particular: authorized NASK S.A. employees, other persons acting under the authority of NASK S.A., as well as authorities and institutions authorized to receive your data under applicable law.Data is also provided to data processors acting on behalf of NASK S.A. and person as acting under their authority. Such entities process data on the basis of an agreement concluded with NASK S.A. and only in accordance with the NASK S.A. instructions and subject to the obligations arising from the GDPR. The entities acting in the name of and on behalf of NASK S.A. include in particular entities rendering services in the field of IT, legal and accounting |
| **Legitimate interest** | Our legitimate interest in data processing is to communicate with you in a timely manner and to answer your queries cost-effectively. If you provide us with your address, we reserve the right to use it for direct postal marketing. You can protect your interest in data protection by transferring of data efficiently (e.g. using a pseudonym). |
| **Recipient categories** | Provider of hosting, service provider for direct marketing |
| **Duration of storage** | Your data will be deleted if it can be inferred from the circumstances that your queries or questions have been completely clarified. However, if a contract is concluded, the data required by commercial and tax law will be retained by us for the periods as required by law, i.g. generally for ten years. |
| **Right of revocation** | You have the right to revoke your consent for processing at any time in compliance with your consent. |
| **Right of access by the data subject** | You may ask the controller to confirm whether your personal data is processed.In the case of such processing, you may request the following information from the controller:1. the purposes of the processing of the personal data;
2. the categories of personal data concerned;
3. the recipients or categories of recipient to whom the personal data have been or will be disclosed;
4. the estimated period of time for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
5. the right to request from the controller to rectify or erase the personal data or the right to restrict the processing of personal data concerning the data subject or to object to such processing;
6. the right to lodge a complaint with a supervisory authority;
7. the right to all available information on the source of the data if the personal data are not collected from the data subject
8. the existence of automated decision-making, including profiling in accordance with Article 22 (1) and (4) of the GDPR and – at least in these cases – meaningful information for your about the logic involved, as well as the consequences and intended effects of such processing.

As a data subject, you have the right to be informed whether the personal data concerning you are transferred to a third country or to an international organisation. In this regard, you may request to be informed of the appropriate safeguards pursuant to Article 49 GDPR relating to the transfer. |
| **Right to rectification** | You have the right to have corrected and/or completed your personal data from the controller if your personal data processed is incorrect or incomplete. The controller has to make the correction without delay |
| **Right to restriction of processing** | You have the right to obtain from the controller restriction of processing where one of the following applies:1. if you contest the accuracy of the personal data relating to you for a period of time that enables the controller to verify the accuracy of the personal data;
2. the processing is unlawful and you refuse to erase the personal data and request the restriction of the use of the personal data instead;
3. the controller no longer needs the personal data for the purposes of processing, but you need them to establish, exercise or defend legal claims; or
4. if you have lodged an objection against the processing in accordance with Art. 21 (1) GDPR and it has not yet been determined whether the legitimate reasons of the controller outweigh your grounds.

Where processing of personal data relating to you has been restricted, such data may, with the exception of storage, only be processed with your consent or for the purpose of establishing, exercising or defending legal claims or for the protecting of the rights of another natural or legal person or for reasons of an important public interest of the Union or of a Member State. If the restriction of processing has been restricted in accordance with the conditions mentioned above, you will be informed by the controller before the restriction of processing is lifted. |
| **Right to erasure** | You have the right to obtain from the controller the erasure of your personal data immediately and the controller is obliged to erase this data without delay where one of the following reasons applies:(1) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;(2) you withdraw your consent on which the processing is based accordance to point (a) of Article 6 (1), or point (a) of Article 9 (2) GDPR and where there is no other legal ground for the processing;(3) you submit an objection to the processing accordance to Article 21 (1) of the GDPR, and there are no legitimate reasons for the processing, or you lodge an objection against the processing accordance to Article 21 (2) of the GDPR;(4) your personal data have been unlawfully processed;(5) your personal data need to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;(6) your personal data have been collected in relation to the offer information society services referred to Article 8 (1).If the controller has made your personal data public and is obliged to erase them accordance to Article 17 (1) of the GDPR, he has to take reasonable steps, taking into account the available technology and the cost of implementation, including technical measures, to inform the controllers who process the personal data that you, as the person concerned, have requested the erasure of any links to, or copy or replication of those personal data.Exceptions**The right to erasure does not apply to the extent that processing is necessary:**1. for exercising the right of freedom of expression and information;
2. for fulfilment of a legal obligation which requires processing by the law of the Union or of the Member States to which the controller is subject, or for the performance of a task carried out in the public interest or the exercise of official authority transferred to the controller;
3. for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9 (2) as well as Article 9 (3) of the GDPR;
4. for archiving purposes in the public interest, scientific or historical research or for statistical purposes in accordance with Article 89 (1), insofar as the right referred to in paragraph 1 is likely to make it impossible or seriously impair the achievement of the objectives of such processing; or
5. for the establishing, exercising or defending legal claims.
 |
| **Notification obligation** | If you have made use of your right to correct, erase or restrict the processing of your personal data, the controller is obliged to inform all recipients to whom the personal data have been disclosed of this correction or erasure of the data or limitation of the processing, unless this proves to be impossible or involves a disproportionate effort.You have the right to be informed of these recipients by the controller. |
| **Automated individual decision-making, including profiling** | You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effect on you or which significantly impairs you in a similar manner.This does not apply if the decision:1. is necessary for entering into, or performance of, a contract between you and a data controller;
2. is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
3. is based on your explicit consent.

However, these decisions may not be based on special categories of personal data in accordance with Article 9 (1), unless point (a) or (g) of Article 9 (2) applies and appropriate measures to safeguard the rights and freedoms and your legitimate interests are in place.Regarding the cases referred to in (1) and (3), the data controller has to take appropriate measures to safeguard the rights and freedoms and your legitimate interests, at least the right to obtain human intervention on the part of the data controller, to state his or her own position and to contest the decision. |
| **Right to lodge a complaint with a supervisory authority** | Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes this Regulation. **Prezes Urzędu Ochrony Danych****Urząd Ochrony Danych Osobowych****ul. Stawki 2, 00-193 Warszawa****Tel. 22 531 03 00.** |