

**PERSONAL DATA PROTECTION CLAUSE IN CONNECTION
WITH REPORTING OF THE BREACH AND UNDERTAKING FOLLOW-UP ACTIONS**

1. The Controller of the personal data is IFIS Finance sp. z o.o. with its registered office in Warsaw, at Wspólna 70, 00-687 Warszawa (IFIS).
2. If you have any questions or requests related to the processing of personal data or if you wish to exercise your rights specified in item 7 below, please contact IFIS at the address specified in item 1 above or the data protection officer at the e-mail address: odo@ifis.pl.
3. IFIS processes personal data for the purpose of preventing, detecting and investigating Breach that may occur in connection with the IFIS' activities, including receiving reports on Breach and undertaking follow-up actions.
4. The bases for the processing of personal data by the IFIS are as follows:
 - (a) to the extent that a Breach report is received and followed up, including investigations, in accordance with the Act on the Protection of Whistleblowers – the legal basis for processing is the legal obligation of the IFIS (Article 6(1)(c) GDPR);
 - (b) to the extent that a Breach may relate to behavior contrary to IFIS' internal procedures and regulations – the legal basis for processing is the performance of a task carried out in the public interest of preventing Breach and protecting whistleblowers (Article 6(1)(e) GDPR);
 - (c) with regard to the defence of IFIS' business interests – the legal basis for the processing is IFIS' legitimate interest (Article 6(1)(f) GDPR), which is to pursue and defend against claims;
 - (d) with regard to special categories of personal data that may be provided to the IFIS in the Breach report or in the process of undertaking follow-up actions, including investigations – the legal basis for processing is the public interest of preventing Breach and protecting whistleblowers (Article 9(2)(g) GDPR).
5. The IFIS shall process personal data indicated in the report of Breach and collected during follow-up actions, including investigations. In particular, IFIS may process the following categories of data: identification data, such as first name and surname, business identification data, such as business position, name under which individual business activity is carried out, the employing entity, as well as contact details (if provided), i.e. e-mail address, telephone number, including business contact details, i.e. e-mail address or business telephone number. IFIS shall process any information concerning the reported Breach and disclosed in the course of the follow-up actions.

6. The recipients of personal data processed by IFIS for the purpose specified in item 4 above may be entities providing legal, audit or evidence collection services for IFIS, other companies of the Banca IFIS Group and public and legal entities, in line with the rules provided for by generally applicable provisions of law. Personal data collected in connection with reports will not be transferred outside the European Economic Area.
7. The individuals whose personal data are processed for the purpose specified in item 4 above have the right to request from IFIS to obtain access to their personal data, correct them, delete them, limit their processing and object to the processing by IFIS of the data, provided that such rights are subject to limitations in cases provided for by law. The individuals also have the right to file a complaint with the President of the Personal Data Protection Office.
8. The personal data will be processed for a period of 3 years from the end of the calendar year in which the follow-up actions were completed or from the date of completion of the proceedings initiated by the follow-up actions, or until an effective objection is made, specified in item 7 above. The period of storage of personal data may be extended by the period of the statute of limitations for claims, if such processing is necessary for their investigation or defence by IFIS.
9. Provision of personal data is voluntary. However, refusal to provide them may prevent the acceptance and processing of the Breach report and follow-up actions.