

## INFORMATION CLAUSE

On the basis of Article 14 item 1 and 2 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 would like to inform, that:

1. The controller of personal data is Eurodebt.eu spółka z ograniczoną odpowiedzialnością with its registered office in Warszawa, address: Pl. Bankowy 2, 00-095 Warszawa, a company entered in the register of entrepreneurs of the National Court Register kept by the District Court for Poznań - Nowe Miasto i Wilda in Poznań, 9<sup>th</sup> Commercial Division of the National Court Register under the KRS number: 0000859424, NIP: 6182186461, REGON: 387015071, with a share capital of 5 000,00 zł (hereinafter referred to as „the Controller”). You can contact us via e-mail: [info@eurodebt.eu](mailto:info@eurodebt.eu), by phone: [+48 22 266 24 88](tel:+48222662488) or by letter to the address of registered office.
2. The controller designated a data protection officer, who can be contacted via email: [inspektor@eurodebt.eu](mailto:inspektor@eurodebt.eu), contact form at: <https://eurodebt.eu/kontakt/> in the contact tab or by letter to the address of registered office. You can contact the data protection officer in all matters relating to the processing of personal data and the exercise of rights related to data processing.
3. The personal data is received from your business partners, contractors or customers of the Controller, and are also obtained from publicly available registers, such as, in particular the Central Register and Information on Economic Activity (CEIDG), National Court Register (KRS), Central Statistical Office (GUS) register of entities registered as VAT payers kept by the Ministry of Finance and others in the field of publicly available data. The personal data can be received including through their transfer or making available by specialized companies running databases of entrepreneurs, as well as from your websites.
4. The personal data may also be received directly from you when you contact the Controller directly.
5. The scope of the processed data is as follows:
  - a) **Natural persons running a business conducted by natural persons subject to the obligation to register in the Central Register and Information on Economic Activity (CEiDG):**
    - name and surname of the entrepreneur,
    - PESEL number, if she/he has one, and date of birth, if she/he does not have a PESEL number - data is disclosed publicly only if the authorized person providing it has not opposed their disclosure in CEIDG,
    - additional terms that the entrepreneur includes in the company, if the entrepreneur uses them,
    - the designation "in inheritance" if succession management has been established,
    - the entrepreneur's REGON identification number, if she/he has one,
    - the entrepreneur's tax identification number (NIP), if she/he has one, and information about its invalidation or repeal,
    - information about the entrepreneur's citizenship,

- address for delivery and - if the entrepreneur has such a place - address of the permanent place of business activity; address data are consistent with the code markings adopted in the national official register of the country's territorial division, if possible in a given case,
- other contact details of the entrepreneur, in particular e-mail address, website address, telephone number, provided that these data were provided by the entrepreneur in the application for entry into CEIDG - data are disclosed publicly only if the authorized person providing them has not objected to them making available in CEIDG,
- the subject of the business activity carried out according to the Polish Classification of Activities (PKD) at the subclass level, including one subject of the predominant activity,
- date of commencement of business activity,
- tax identification number (NIP) and REGON identification number of the civil partnership, if the entrepreneur has concluded an agreement of such a partnership,
- details of the legal representative, if required,
- date of suspension and resumption of business activity,
- date of cessation of business activity, if it was reported in the application for entry into CEIDG,
- information about the entrepreneur's deletion from CEIDG,
- information about the limitation or loss of legal capacity and the establishment of guardianship or care, including the details of the curator or guardian,
- information about the declaration of bankruptcy, the completion or discontinuation of bankruptcy proceedings and the details of the trustee,
- information about the final dismissal of the bankruptcy petition due to the fact that the assets of the insolvent debtor are not sufficient to cover the costs of the proceedings or are only sufficient to cover these costs,
- information about the final repeal or expiration of an arrangement concluded in restructuring, bankruptcy or restructuring proceedings,
- information about the opening of restructuring proceedings, about their completion or discontinuation, or about the decision to approve the arrangement in the arrangement approval proceedings becoming final and binding, and details of the supervisor or manager,
- information on the transformation of an entrepreneur who is a natural person conducting business activity on his own behalf into a sole proprietorship company,
- information about the ban on conducting business activity,
- information about the ban on practicing a specific profession, the exercise of which by the entrepreneur is subject to registration in CEiDG,
- information about the prohibition to conduct activities related to the upbringing, treatment, education of minors or their care,
- information on the existence or termination of marital property, if it was reported in the application for entry into CEIDG,
- date of death or discovery of the entrepreneur's body,
- details of the successor manager, if a successor manager has been appointed,
- data of the successor manager appointed in the event that the successor manager appointed first resigns from performing this function or is unable to perform it due to death, limitation or loss of legal capacity, dismissal by the entrepreneur or the decision on the prohibition referred to in article section 2 of the Act of July 5, 2018 on the succession management of a natural person's enterprise and other facilitations related to the succession of enterprises (Journal of Laws of 2021, item 170),
- information about the establishment of the succession management board and the date of establishment of the succession management board;
- information that the succession manager has ceased to perform this function due to:
  - a) death,
  - b) limitation or loss of legal capacity,
  - c) appeals,

d) resignation,

e) the decision on the prohibition referred to in article 8 section 2 of the Act of July 5, 2018 on the succession management of a natural person's enterprise and other facilitations related to the succession of enterprises and the date on which the succession manager ceased to perform this function for the reasons indicated in point a-c and e or the date of submission of the declaration of resignation by the successor manager, in the case referred to in letter d,

- information about the appointment of the next succession manager and the date of appointment of the next succession manager,
- information about the period for which the succession management was extended by the court,
- information about the expiration of the succession management and its expiry date appointment of succession management,
- information about obtaining, revoking, losing and expiring rights resulting from:
  - a) concession,
  - b) licence,
  - c) permits,
- information about entry in the register of regulated activities, prohibition to perform the activity indicated in the entry and deletion from the register,
- information about submitting an application for confirmation of the succession manager's ability to execute decisions regarding concessions, licences and permits, confirmation by the authority of the succession manager's ability to execute this decision or transfer of the decision,
- information on submitting the application referred to in article 45 section 2 of the Act of July 5, 2018 on the succession management of a natural person's enterprise and other facilitations related to the succession of enterprises;
- information about obtaining and losing professional qualifications confirmed by a master's diploma or an apprentice certificate referred to in article 3 section 1 point 2 and 3 of the Act of March 22, 1989 on crafts (Journal of Laws of 2020, item 2159), issued by the chamber of crafts.

**b) Commercial law companies subject to the obligation to enter the National Court Register (data downloaded from <https://ekrs.ms.gov.pl/>):**

- data disclosed in the register of entrepreneurs and in the register of associations, other social and professional organizations, foundations and independent public health care facilities:

- section 1 – entity data, such as:

- designation of the legal form,
- REGON/NIP number,
- the name under which the company operates,
- data on prior registration,
- information about the entrepreneur running a business conducted by natural person with other entities under a civil partnership agreement,
- information whether the entity has the status of a public benefit organization,
- information about the registered office and address of the entity and its contact details,
- information about branches,
- information about the concluded contract: date, notary, reference number, notarial deed number, information about changes contained in the notarial deed,
- information about the period for which the company was established,

- information about a publication other than the Court and Economic Monitor intended for company announcements,
- information about how many shares a partner may have,
- information whether the statute grants personal rights to specific shareholders or titles to participate in the company's income or assets not resulting from shares,
- information about whether bondholders are entitled to shares in profit?
- information on how the company was established,
- details of partners: name and surname or name or company, PESEL/REGON number, KRS number, shares held by the partner, indication whether the partner holds all the shares of the company,
- information about the company's capital: amount of share capital, information about contributions in kind,

- section 2 – information about the representation, such as:

- information about the bodies authorized to represent the entity (name of the body and method of representation), personal data of persons constituting the body: name and surname or name or company, PESEL/REGON number, KRS number, function in the representing body, information on suspension from activities,
- information about supervisory authorities,
- information about proxies,

- section 3 – information about the subject of activity:

- information about the objects of activity (PKD) prevailing and other,
- mentions of submitted documents,
- reports of the capital group,
- the scope of activities of the statutory public benefit organization,
- information about the day ending the financial year,

- section 4 – information about the financial situation, such as:

- information about arrears, receivables, bankruptcy announcements, discontinuation of enforcement proceedings,

- section 5 - information about the curator,

- section 6 – other information such as:

- information on the liquidation or dissolution of the company, its merger or transformation, bankruptcy and arrangement proceedings, restructuring or restructuring proceedings, suspension of operations.

**c) Entities conducting non-agricultural economic activity outside Poland:**

- data of enterprises operating outside Poland will be processed, data available in public registers on the basis of regulations regarding the disclosure of this data in the country where the enterprise conducts business activity.

**d) Your personal data available via:**

- websites,
- Google business cards,
- opinions available on public websites,
- receivables exchanges and debt exchanges.

6. Your personal data is processed in a legitimate interest of the data controller and the Controller's Client (on the basis on Article 6 item 1 letter f) GDPR), which is which is a verification service in terms of the security of business transactions by examining the payment credibility of entrepreneurs and assessing the risk of commercial transactions.
7. Your personal data will also be processed by the purpose of establishing or pursuing possible claims or defending against such claims by the Controller - processing is necessary for the purposes of the legitimate interests pursued by the Controller (art. 6 item 1 lit. f GDPR), consisting in the protection of the Controller's rights.
8. Your personal data will be processed and stored for the period necessary to achieve the above-mentioned purposes, and after this period for the purposes and for the time and to the extent required by law or to secure any claims or until an effective objection to processing is raised. In addition, the storage period also results from statutory limitation periods, which are specified in detail in the Act of April 23, 1964 Civil Code
9. In connection with the implementation of services, the Controller will transfer the collected personal data to external entities, including in particular:
  - a) customers who ordered a financial report about your company,
  - b) entities with which the Controller cooperates on the basis of concluded contracts, such as: suppliers responsible for operating IT systems, banks and payment operators, entities providing accounting, legal, auditing, consulting services and entities related to the Controller,
  - c) competent authorities or third parties who submit a request to provide such information based on an appropriate legal basis and in accordance with the provisions of applicable law - by making such disclosure of personal data, the Controller guarantees that only the information necessary will be provided to fulfill the request.
10. The level of protection of personal data outside of the European Economic Area (EEA) differs from that provided by European law. The Controller always informs about the intention to transfer personal data outside the EEA at the collection stage. For this reason, you personal data will be transmitted outside the EEA only when it is necessary and with an adequate level of protection, primarily through:
  - a. Cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued;
  - b. use of standard contractual clauses issued by the European Commission;
  - c. applying binding corporate rules, approved by the competent supervisory authority.
11. We will not make automated decisions for you, including decisions resulting from profiling.
12. You have the right to request access to your data, rectification, erasure or limitation of processing from us. In case of doubts related to the processing of personal data, each person may ask the Controller for information.

- 13.** You have the right to object to the processing in a situation where personal data will be processed on the basis of art. 6 item 1 lit. f) GDPR (legitimate interest of the Controller). After the objection is raised, the Controller will no longer be able to process personal data, unless he demonstrates the existence of valid legally valid grounds for processing, overriding the interests, rights of freedom of the data subject, or grounds for establishing, pursuing claims or defending against claims.
  
- 14.** Notwithstanding the above, everyone has the right to lodge a complaint with the supervisory authority - the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warszawa, tel. 22 531-03-00, e-mail: kancelaria@uodo.gov.pl).