

# Information clause for individuals visiting social media profiles

In connection with fulfilling our obligations under 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), we hereby provide information on the processing of personal data.

## I. Personal Data Controller

Edisonda P.S.A. with the registered seat in Kraków, at Dietla 52/9 street (31-039 Kraków), entered into the Register of Entrepreneurs under number KRS 0001036444.

## II. Data Protection Officer

The Data Protection Officer has been appointed. The Officer can be contacted as follows:

- a. by traditional mail at the address indicated above
- b. by email at [iod@edisonda.pl](mailto:iod@edisonda.pl)

## III. Types of social media services

### Facebook and Instagram

- a. Fanpage of Edisonda P.S.A.. is available within Facebook and Instagram, whose provider is Meta Platforms (formerly: Facebook Inc.)
- b. Principles governing the use of your personal data in the Facebook, Instagram and Messenger services as well as other products and functions offered by Meta Platforms can be found in Facebook's Privacy Policy available at: <https://www.facebook.com/privacy/explanation/>.

### LinkedIn

- a. Fanpage of Edisonda P.S.A. is available within the LinkedIn service.
- b. Principles governing the use of your personal data by the service provider are available at: <https://www.linkedin.com/legal/privacy-policy>.

### Twitter

- a. Fanpage of Edisonda P.S.A. is available within the Twitter service.
- b. Principles governing the use of your personal data by the service provider are available at: <https://twitter.com/en/privacy>.

### YouTube

- a. Fanpage of Edisonda P.S.A. is available within the YouTube service, whose provider is Google LLC.
- b. Principles governing the use of your personal data by Google LLC are available at: <https://policies.google.com/privacy?hl=pl>.

## IV. Purposes of personal data processing and legal grounds on which the Controller bases the processing of personal data

No.	Purpose of processing	Legal basis	Period of processing
1.	Running of fanpages on social media sites under the terms and conditions specified by the administrators of these sites and in accordance with the rules of these sites. Thanks to them, we can inform you about our activities, promotions, competitions and we build and maintain a community of our fans. You	Pursuant to Article 6 par. 1 item f) of GDPR	Information within posted comments, reactions – will be available on the site until deleted by the author, in the case of direct messages addressed to us via social networks, will be processed until you raise an objection

	can communicate with us through the available functionalities of these services, such as replies to reports, comments, reactions and private messages.		
2.	Statistical and advertising activities carried out through the tools provided by the applications of the respective social media sites. These activities are carried out on the basis of our legitimate interest, in order to ensure continuity of communication and to handle enquiries and complaints.	Pursuant to Article 6 par. 1 item f) of GDPR	The period of availability of these data in the services as determined by the internal rules of the relevant websites
3.	If your personal data were to be processed for a purpose other than those indicated above, each time this will take place after you give your consent to the processing of your personal data, to the extent and for the purpose indicated in your consent	Pursuant to Article 6 par. 1 item A) of GDPR Pursuant to Article 6 par. 1 item f) of GDPR	Until withdrawal of consent Until effective objection

## V. Sources of data

Edisonda P.S.A. as the administrator of the fanpage processes your data if: you subscribe to the fanpage by clicking the "Like", "Follow", "Share" or "Subscribe" icon, you write a message or publish a comment under any of the posts posted on Edisonda's fanpage on a profile in social media such as Facebook, LinkedIn, Instagram, Twitter, YouTube.

## VI. Scope of data

- a. identifier (including first and last name or nickname)
- b. profile photo
- c. other photos or videos (which may also include the image)
- d. content of the comments left
- e. reactions
- f. automatically collected technical data about your visits to the social media (e.g. IP address, domain name, type of browser you use, type of operating system, etc.).
- g. anonymous statistical data about visits to the fanpage available via the available function on the respective social network (e.g. "Facebook Insights") provided by Facebook), collected via cookies, each of which contains a unique user ID that can be linked to the data of users registered on the respective social network.

Provision of data is voluntary; however, if you do not provide such data, you will not be able to communicate with us via the available social networking functionalities (e.g. via comments and private messages).

## VII. Data recipients

The Controller may share the personal data with postal operators, state authorities authorised under the law, companies affiliated by capital with the Controller (or other entities affiliated with Grant Thornton International, for internal administrative purposes as well as in instances of transferring the personal data where the entity acts as a subcontractor of the Controller). In addition, the data may be transferred in particular to software providers, IT service providers, administrative support providers, document shredding service providers, data protection consultants and owners of social networking media, subject to the terms established in the rules of such media.

## VIII. Transfer of personal data to a third country

As a rule, personal data will not be transferred outside the European Economic Area or made available to international organisations, without prejudice to the supranational character of data flow within the following social media: Facebook, LinkedIn, Instagram, Twitter, YouTube. The above entities declare application of the standard contractual clauses approved by the European Commission and reliance on the decisions of the European Commission finding an adequate

level of protection for personal data for individual countries, where the data may be transferred. More information may be obtained at the websites of the above social networking media.

#### **IX. Information on joint control of the data**

The following service providers:

- Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA.
- Instagram Inc., 1601 Willow Road, Menlo Park, California 94025, USA
- LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.
- Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.
- Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Dublin, Ireland.

are co-controllers of your personal data to the extent of processing for statistical and advertising purposes, which includes collective analysis of data in order to display statistics of user activity on the fanpage of Edisonda P.S.A.

Each co-controller using the technical means provided within the service decides on the purposes and means of data processing, but to a different extent, therefore the owner of the fanpage of Edisonda P.S.A. is responsible only to the extent of the data processed by itself.

#### **X. Catalogue of data subjects' rights**

You have the following rights in relation to the processing described above:

- a. right of access to the personal data,
- b. rectification of the data,
- c. erasure of the data, in absence of premises from Article 17 par. 3 of GDPR,
- d. restriction of processing,
- e. objection against processing,
- f. data portability,
- g. lodging a complaint with the President of the Personal Data Protection Office, to the extent related to the data processing carried out by the Controller.

At the same time, we would like to point out that the preferred form of contact during the exercise of the above mentioned catalogue of rights is email, addressed to: [iod@edisonda.pl](mailto:iod@edisonda.pl).

#### **XI. Information on automated decision making, including profiling**

There is no profiling, including automated decision making, in the processing of personal data.