

**Information on the processing of personal data
in connection with the use of video surveillance
at Elemental Strategic Metals sp. z o.o.**

Who is the controller of personal data?	In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 Elemental Strategic Metals sp. z o.o. with its registered office in Grodzisk Mazowiecki (05-825) at ul. R. Traugutta 42a (hereinafter: Controller). The Controller can be contacted via: 1. traditional mail (by sending correspondence to the Controller's registered office address indicated above) 2. e-mail address: office@elementalsm.pl. The Controller is responsible for the security of the personal data provided and for processing it in accordance with the law.
For what purpose and on what legal basis do we process personal data?	Your personal data in the form of an image recorded in the video surveillance system will be used to ensure: 1. the safety of persons employed by the Controller, 2. the safety of other persons present on the Controller's premises, 3. protection of the Controller's property. In connection with the above, the basis for the use of your personal data is the legitimate interest of the Controller (i.e., Article 6(1)(f) of the GDPR).
Will the data be subject to profiling?	Your personal data will not be used to make decisions based solely on automated processing of personal data, including profiling within the meaning of Article 22 of the GDPR.
How long will we use the data we collect?	Personal data collected through the video surveillance system will be stored for no longer than 3 months from the date of recording, subject to the following retention periods: – Offices – 30 days, – Production area – 30–60 days, – External area – 30 days, – HSA – 60–90 days. In the event that the recordings constitute evidence in proceedings conducted on the basis of law or the Controller becomes aware that they may constitute evidence in proceedings, this period shall be extended until the proceedings are legally concluded. After the expiry of the specified periods, recordings containing personal data shall be destroyed/deleted, unless separate provisions provide otherwise.
What rights does a person whose data we process have?	You have the right to submit a request concerning: 1. access to data (including obtaining information about what data is processed by the Controller and to what extent, as well as obtaining copies of such data - details: Article 15 of the GDPR), 2. rectification of data (i.e. correction if the data processed by the Controller is incorrect or incomplete - details: Article 16 of the GDPR),

	3. erasure of data (if, for example, the data is no longer necessary for the purposes for which it was collected or the Controller has no legal basis for processing the data - details: Article 17 of the GDPR), 4. restriction of data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data is no longer needed by the Controller but must be processed because of your claims - details: Article 18 of the GDPR), 5. objection to the processing of personal data, including profiling (if personal data is processed on the basis of the Controller's legitimate interest or is used for direct marketing purposes – details: Article 21 of the GDPR), 6. transfer of data to another controller (if the processing of data provided to the Controller is carried out in an automated manner, on the basis of consent or on the basis of a contract - details: Article 20 of the GDPR). If the processing is based on consent (e.g., consent to the use of data for marketing purposes), you have the right to withdraw your consent at any time in any manner. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. In addition, you have the right to lodge a complaint with the President of the Personal Data Protection Office (supervisory authority) if you believe that the processing of personal data violates the law (for more information: https://uodo.gov.pl/pl/83/155).
Who do we share your data with?	While maintaining all data security guarantees, we may transfer your data to other entities, including entities authorized to receive it under applicable law, entities processing it on our behalf (e.g., technical service providers, hosting service providers, analytical service providers, entities providing us with consulting services), and other controllers (e.g., notary or law firms), and other companies from the Elemental Capital Group.
Do we transfer data outside the European Economic Area (EEA)?	If necessary to achieve the purposes indicated above, we may transfer your personal data to our recognized subcontractors or contractors in countries outside the EEA. Bearing in mind that the level of personal data protection in these countries may differ from that provided by the GDPR within the European Union, data transfers are carried out with an adequate level of protection, primarily through: 1. cooperation with entities processing personal data in countries outside the EEA which the European Commission has found to provide an adequate level of protection (this applies, among others, to companies in the US certified under the approved EU-US Privacy Shield Framework, such as Microsoft), and in the absence of the above-mentioned decision of the European Commission: 2. the use of standard contractual clauses in agreements with such companies, 3. the use of binding corporate rules approved by the competent supervisory authority, 4. application of the conditions specified in Article 49 of the GDPR. The controller ensures that each transfer of personal data is carried out on the basis of appropriate agreements, in a secure and controlled manner.

	In each of the cases described in points 2-4 above, you may request further information about the safeguards applied in this regard, obtain a copy of these safeguards, and information about where they are available.
How can you contact us regarding matters related to personal data protection?	In matters related to personal data protection, you can contact the Controller via: 1. e-mail address: gdpr@elemental.biz. 2. the Controller's mailing address indicated above.