

Information Regarding the Processing of Personal Data
for employees of contractors and subcontractors (external companies), including work coordinators and
decision-makers, authorized to perform work on the premises of 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 hereby 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). You may contact the Controller via: 1. regular mail (by sending correspondence to the Controller's registered office address indicated above), 2. email: 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 may be used by the Controller for the following purposes: 1. formal authorization of the contractor or subcontractor (external company) on whose behalf you perform work to carry out work on the Controller's premises, including verification of professional licenses and qualifications, the validity of medical examinations and occupational safety and health training, and instruction, issuing and storing the External Company Work Authorization Card with attachments, as well as accepting the work (legal basis: Article 6(1)(c) of the GDPR—a legal obligation arising from the provisions of the Labor Code regarding the provision of safe and hygienic working conditions, including Articles 208 and 304 of the Labor Code, and, with regard to information on the validity of medical examinations, Article 9(2)(b) of the GDPR), 2. ensuring the safety of persons and property on the premises, including providing the security desk with a list of authorized personnel, recording entries, and issuing ID badges and access cards (legal basis: Article 6(1)(f) of the GDPR—legitimate interest), 3. conducting inspections and audits of compliance with health and safety regulations and rules by third-party companies, including documenting non-compliance in official reports (including photographic documentation, which may include your image), issuing and enforcing post-inspection recommendations, suspending work, and issuing penalty notices (legal basis: Article 6(1)(c) of the GDPR—a legal obligation under the Labor Code; and Article 6(1)(f) of the GDPR—a legitimate interest in ensuring the safety of persons and property and documenting violations of health and safety regulations and rules), 4. performance of a contract (service agreement, purchase order) concluded with the contractor, including contact with the contractor's work coordinators and decision-makers (legal basis: Article 6(1)(f) of the GDPR—legitimate interest, and in cases where the contractor is a natural person conducting business activity: Article 6(1)(b) of the GDPR—performance of a contract),

	5. demonstrating the Controller's proper fulfillment of its occupational health and safety obligations, as well as pursuing claims or defending against claims related to work on the premises (including those arising from debit notes) (legal basis: Article 6(1)(f) of the GDPR—legitimate interest); The time limits for asserting claims arising from the contract are specified in detail in the Civil Code. The transfer of personal data is based on the contract concluded between the Controller and the contractor and—to the extent necessary to ensure safe and hygienic working conditions—on applicable law. Providing your data is necessary for you to be permitted to perform work on the Controller's premises. Refusal to provide your data means you will not be permitted to work on the premises.
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 as defined in Article 22 of the GDPR.
How long will we use the collected data?	Personal data will be used for the period necessary to achieve the purposes indicated above. Depending on the purpose and legal basis, this will be, respectively: 1. the duration of the Controller's cooperation with the contractor and 1 year following its termination—in the case of the Authorization Card for an external company to work on-site, along with its attachments, 2. 1 year from the end of the calendar year in which the contractor performed work on the premises—in the case of documentation from health and safety inspections and audits, 3. 5 years from the end of the calendar year in which the charge notice was issued—in the case of documentation serving as the basis for its issuance, 4. the statute of limitations for claims; however, if your data constitutes evidence in proceedings conducted under applicable law or if the Controller becomes aware that it may constitute evidence in such proceedings, this period is extended until the proceedings are legally concluded, 5. the period until any effective objection is filed.
What rights do you have as a data subject?	You have the right to submit a request regarding: 1. access to your data (including the right to obtain information about what data the Controller is processing and to what extent, as well as to obtain a copy of such data)—details: Article 15 of the GDPR, 2. rectification of data (i.e., correcting it if the data processed by the Controller is inaccurate or incomplete) – details: Article 16 of the GDPR, 3. deletion 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 contest the accuracy of the personal data used by the Controller, or if the data is no longer needed by the Controller but must be processed because you are asserting your claims) – details: Article 18 of the GDPR,

	5. objection to the processing of personal data (if personal data is processed on the basis of the Controller's legitimate interest) – details: Article 21 of the GDPR, 6. the right to data portability to another controller (if the processing of data provided to the Controller is carried out by automated means on the basis of a contract)—details: Article 20 of the GDPR. In addition, you have the right to file a complaint with the President of the Personal Data Protection Office (the supervisory authority) if you believe that the processing of personal data violates the law (more information: https://uodo.gov.pl/pl/493/155).
To whom do we disclose your data?	While ensuring all data security safeguards, we may disclose your data to other entities, including the contractor (your employer or client) and its subcontractors—to the extent necessary for the performance of the work—as well as to entities authorized to receive such data under applicable law (e.g., the National Labor Inspectorate, the National Sanitary Inspectorate, courts), entities processing it on our behalf (e.g., Elemental Global Services S.A., which provides support services to us; entities providing personal and property security services; providers of technical and IT services; and entities providing us with consulting services) as well as other data controllers (e.g., law firms), including other companies within the Elemental Capital Group.
Do we transfer data outside the European Economic Area (EEA)?	The controller does not transfer your personal data to countries outside the European Economic Area or to international organizations.
How can you contact us regarding matters related personal data protection?	For matters related to the protection of personal data, you may contact the Controller via: 1. email address: gdpr@elemental.biz, 2. the Controller's mailing address indicated above.
Where does your data come from, and what data do we process?	Your personal data was provided to the Controller by a contractor (an external company), including the work coordinator, in connection with your authorization to perform work on the Controller's premises. We obtain some data directly from you (e.g., submitted statements and signatures) or it is determined by the Controller's employees during health and safety inspections (e.g., descriptions of irregularities, photographic documentation). The Controller processes the following categories of your data: first and last name, job title or role (e.g., worksite coordinator, decision-maker), contact phone number, company name and address (of the contractor or subcontractor), and tax identification number (NIP)—for sole proprietors, information about professional licenses and qualifications (type, number, expiration date), information regarding the validity of medical examinations (excluding the content of the medical certificate), information regarding completed occupational safety and health training and instruction, a declaration of being at least 18 years of age, the content of submitted declarations and signature, ID number or access card number, and, in the event of irregularities—a photograph and a description of the irregularities found and the recommendations issued.