

SOCIAL MEDIA PRIVACY POLICY

Brose Sitech sp. z o.o.

dated 14.07.2022.

I. INTRODUCTION

This Policy describes the processing of personal data that takes place in connection with your visit to Brose Sitech's official social media accounts ('**Fanpages**').

If you visit our Fanpage, we may receive information about:

- your **actions** and **interactions** in relation to our Fanpage, such as subscribing, leaving a reaction, like or comment, sharing a post or sending us a message
- your **publicly available profile data**, such as your name and profile picture. Please note that the personal data that can be publicly accessed depends on your profile settings, which can be adjusted individually in the settings on the respective social network.

The data processing on the Fanpages - to various extents - is the responsibility of:

- **Brose Sitech sp. z o.o.** with headquarters in Polkowice (,Brose Sitech' or 'we'),
- **the operators of the social networks** (respectively: '**Operators**' and '**Social Networks**' or '**Websites**').

This Policy defines how we process personal data on the following Social Networks:

- **Facebook:** Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland - Operator of our Fanpage at <https://www.facebook.com/BroseSitechPolska>),
- **LinkedIn:** LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2 Ireland - Operator of our Fanpage at: <https://www.linkedin.com/company/brose-sitech-group/>). We process your personal data in accordance with 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 ('**GDPR**').

Below you will find detailed information on the processing of personal data in connection with the use of our Fanpages.

II. ENTITIES INVOLVED IN THE PROCESSING OF PERSONAL DATA

1. Brose Sitech

The Administrator of your personal data is Brose Sitech sp. z o.o. (limited liability company) with its registered office at ul. Strefowa 2, 59-101 Polkowice, Poland, entered into the Register of Entrepreneurs of the National Court Register for Wrocław-Fabryczna in Wrocław, 9th Commercial Division of the National Court Register under the number 0000062266 ('**Administrator**').

You can contact the Administrator through our appointed Data Protection Officer at: iod@brose-sitech.com or by post at the Administrator's address (ul. Strefowa 2, 59-101 Polkowice, Poland).

For certain processing operations, a **co-administrator** relationship within the meaning of Article 26 of the GDPR also exists between the Administrator and the individual Platform Operators (see more in point VI below).

2. SOCIAL NETWORK OPERATORS

Depending on the tools used for Fanpages, Operators may have the status of:

- separate **administrators** of personal data from Brose Sitech,
- **co-administrators** of personal data - together with Brose Sitech,,
- **data processors** based on a commission from Brose Sitech.

The operators of the Social Networks are responsible for the processing of personal data on the Portal on which we operate our Fanpages. These Operators generally process the personal data of the users of the Fanpages regardless of whether they have an account on the respective Portal or whether they are logged in. In addition, the Operators generally use cookies and other data storage and tracking technologies. You can find further information about the processing of personal data by the Operators of the Social Networking Sites on the websites of the respective Sites:

- Facebook Data Policy;
- LinkedIn Privacy Policy

III. CATEGORIES OF DATA SUBJECTS AND SCOPE OF DATA PROCESSING

1. FACEBOOK

As part of our Fanpage, we process data of individuals who have interacted with it by:

- subscribing to the account, clicking the 'Like' or 'Observe' icon,
- posting a comment, sharing a comment or clicking the 'Like' icon under any of the posts on the Fanpage,
- sending us a private message.

We process the following types of personal data:

- an account ID (usually including your name or nickname),
- profile picture,
- other photos (which may include an image),
- the content of comments or private messages,
- statistics about Fanpage visitors available through the Facebook Insights tool and collected through cookies.

2. LINKEDIN

As part of our Fanpage on LinkedIn, we process the data of individuals who:

- visited the Fanpage,
- interacted with the Fanpage,
- published or submitted data through the services offered by LinkedIn (e.g. filled in forms, answered surveys).

We process the following types of personal data:

- first name, last name, image and other identifying data made publicly available by you on the profile you have created on LinkedIn (e.g. address, contact details e.g. email address, phone number, and details of your education, length of service, professional entitlements and previous employment),
- statistics about visitors' account available through the LinkedIn Page Analytics tool and collected through cookies.

IV. PURPOSES AND LEGAL BASIS FOR PROCESSING

We process your personal data on the basis of:

1. **legitimate interest** (Art. 6(1)(f) GDPR) consisting of:

- informing you via the Fanpage about our activities,
- promoting our brand, products, services, events,
- building and maintaining the Fanpage community,
- ensuring order and safety by moderating users' posts and comments,
- communicating with users and potential customers through the available functionalities of the Websites (e.g. comments, messages),
- keeping statistics and analysing data on user activity (see more under IV below),
- the possible establishment, investigation or defence of claims.

2. **given consent** to the extent and for the purpose specified in the content of the separate consent (Article 6(1)(a) or Article 9(2)(a) of the GDPR),

3. **statutory requirements** in order to fulfil our legal obligations under the law (Art. 6(1)(c) GDPR).

V. ANALYTICS, STATISTICS AND ADVERTISING

Social networks provide us with **anonymous statistics** on the use of our Fanpages. The analytics and statistics services provided by the Operators concern the activities and interactions of users. This includes the following information:

- likes, shares, comments,
- the number of visitors and followers,
- individual areas of the pages accessed,
- reach of posts,
- statistics on the age, language, background or interests of the observers.

We use this information to:

- engage with our observing users and potential customers,
- understand the purpose of use and reach of our posts,
- evaluate content and determine user preferences,
- tailoring our Fanpages to our target audience as effectively as possible,

- placing advertisements and highlighting our posts on the social networks we use.

The above mentioned information is anonymous. Their use does not involve us processing personal data of individual users. We also do not combine this data with other personal data. Furthermore, this information does not allow us to identify users to whom interest-based advertising is displayed.

Insofar as we carry out a broader comparison with the customer lists that we post on various social media sites within the framework of interest-based advertising, this is done solely on the basis of the consent you have given us (Article 6(1)(a) GDPR).

It may be the case that Operators create independently their own personalised usage statistics, for example for market research and advertising purposes and for other commercial and business purposes. You will find further information about the processing of your personal data by the Operator of the Social Networks in the creation and processing of such statistics on the websites of the respective Websites:

- Information on Facebook statistics is available at:

[https:// www.facebook.com/legal/terms/informaon_about_page_insights_data](https://www.facebook.com/legal/terms/informaon_about_page_insights_data),

- LinkedIn privacy policy (summary users group statistics) available at: <https://www.linkedin.com/legal/privacy-policy>.

In case we organise promotional campaigns via the Social Network, the principles for processing your personal data, including the purpose and legal basis for such processing, are described in the **terms and conditions** of such campaigns. Please read the terms and conditions before participating in such a promotional action.

VI. CO-ADMINISTRATION OF PERSONAL DATA

With regard to the processing of data concerning site statistics and the activities that trigger these statistics, we, together with the Operators, act as co-administrators of personal data within the meaning of Article 26(1) of the GDPR.

In the case of the Facebook Social Network, the co-administrator remains Facebook Ireland Limited. The rules for the co-administration of data for the purposes of statistics and advertising can be found at: https://www.facebook.com/legal/terms/page_controller_addendum.

For the LinkedIn Social Network, the co-administration remains LinkedIn Ireland Limited Company. You will find the rules of data co-administration for statistics and advertising at: <https://legal.linkedin.com/pages-joint-controller-addendum>.

V. DATA RECIPIENTS

Your personal data will be accessed by:

- our authorised personnel and entities that provide services to us (such as marketing services, IT and technical support services, among others), who must have access to the data in order to perform their duties,
- other users of the Social Network - as information about Fanpage followers, likes, as well as the content of comments, posts and other information provided by users is made public,
- public authorities and entities performing public tasks or acting on commission of public authorities, to the extent and for the purposes that result from the commonly applicable laws,

- the Operator of the Social Portal in accordance with the principles described in the privacy policies provided.

The operators of the Social Networking Sites are separate entities raising their own responsibility for the processing of data of persons using the Social Networking Sites, including data relating to you. These entities also process your personal data for their own purposes and on the basis of the legal grounds they have established. In particular, they may - on the basis of their own Social Network Operating Rules - collect and process the information contained in the cookies of visitors to our Fanpage. Our influence over the processing of data by Social Network Operators is in this regard limited. For this reason, we ask you to read their terms of use and the privacy policies provided therein, which you can find here:

- Facebook: <https://www.facebook.com/about/privacy>,
- LinkedIn: https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footerprivacy-policy.

VI. TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

As the Administrator of your personal data, we do not transfer your personal data to a third country (outside the EEA) or an international organisation.

VII. DATA STORAGE PERIOD

The duration of the processing of your personal data is related to the purposes and grounds for the processing, whereby:

- data processed on the basis of consent will be processed until consent is withdrawn,
- data processed on the basis of statutory requirements will be processed for as long as the law mandates the retention of the data,
- data processed on the basis of the Administrator's legitimate interest will be processed until you successfully lodge an objection or that interest ceases, i.e.:
 - by default, we process your data until we have terminated the Fanpage on the Social Network,
 - we store personal data that we have obtained in ongoing correspondence for the duration of the handling of the message sent to us,
 - data processed for the purpose of establishing, investigating or defending against claims, we process for a period equal to the period of limitation of these claims.

We only process your personal data until it is no longer necessary for the purposes indicated or when the purposes specified are no longer applicable and there is no other legal basis for the processing.

Unforeseen circumstances may occur that justify the need to store personal data for longer. In particular, circumstances may come to light that will be investigated by a public administration body or a court in the context of criminal, civil or administrative proceedings.

VIII. YOUR RIGHTS

In accordance with the GDPR, you have certain rights in relation to the processing of your personal data by the Administrator:

- **the right to access your personal data** - the right to obtain information about the processing of your personal data and a copy of your data;
- **the right to correct the personal data** - the right to rectify inaccurate data or complete incomplete data;
- **the right to erasure of personal data** - the right to request the erasure of data whose processing is no longer necessary for any of the purposes for which the data was collected;
- **the right to object** - if the processing is based on the best legitimate interest, you have the right to object to the processing of your data. You also have the right to object to processing for direct marketing purposes. The same applies to profiling insofar as it is related to direct marketing.
- **the right to restrict the processing of your personal data** - the right to restrict the processing of your data only to its storage in certain cases;
- **the right to transfer the data** - the right to request the release of the data provided, in machine-readable format (via computer), to the extent that the data is processed on the basis of a concluded contract or consent;
- **the right to withdraw consent** - where the processing of your data is based on consent, you have the right to withdraw your consent at any time and without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal,
- **the right to lodge a complaint with a supervisory authority** - the right to lodge a complaint if you consider that the processing of your personal data violates data protection regulations to the President of the Office for Personal Data Protection at: ul. Stawki 2, 00-193 Warsaw, Poland.

To exercise your rights, please contact us electronically or by post at the address indicated in **point II of the Policy**.

IX. SOURCE OF DATA AND OTHER INFORMATION

Your personal data comes directly from you as a result of your use of our Fanpage on the Social Network as well as your public profile.

The provision of data is voluntary and occurs through the use of our Fanpage. Your personal data will not be subject to automated decision-making, including profiling.

X. POLICY CHANGES

The social media privacy policy may be subject to change, of which we will give seven days' notice. For questions related to the Social Media Privacy Policy, please contact: iod@brose-sitech.com.