

## **Information on GDPR Concerning the Processing of Personal Data Contained in Electronic Correspondence**

### **I. Data Controller**

Karolina Dyrła–Mularczyk, conducting business under the name Stat.Haus Dyrła&Dyrła Karolina Dyrła-Mularczyk, with its registered office in Poznań (60-533), at ul. Polna 28/27, holding NIP number: 9591747579, and REGON number: 366476756, is the data controller for the recipients and senders of electronic correspondence. You can contact the data controller:

- a. At the correspondence address: ul. Polna 28/27, 60-533 Poznań
- b. By email: [iod@stat.haus](mailto:iod@stat.haus)

### **II. Purposes and Duration of Personal Data Processing**

1. The data controller processes contact information about the senders and recipients of email correspondence, contained within the content of this correspondence, for the following purposes:
  - a. To facilitate email contact with the data controller and to initiate contact with recipients;
  - b. To document arrangements made with clients, contractors, and other individuals;
  - c. To receive letters, complaints, and applications electronically, such as complaints, appeals, and other requests;
  - d. To protect against claims and to pursue potential claims.
  - e.
2. Correspondence is stored for one year unless the messages contain content relevant to pursuing claims or defending against claims. In such cases, selected messages will be stored for up to three years, which is the limitation period for claims according to the Civil Code.

### **III. Legal Basis for Data Processing**

1. The legal basis for processing the data contained in email correspondence is:

- a. Legitimate interest of the Data Controller and Email Senders (Article 6(1)(f) of the GDPR) – for incidental correspondence, to enable electronic contact with the Data Controller.
- b. Necessity for the performance of a contract (Article 6(1)(b) of the GDPR) – for correspondence conducted to fulfill a contract with clients or contractors.
- c. Explicit consent – if the correspondence contains special categories of data. If the sender has not provided consent in their correspondence, they will be asked to provide it separately, as it is a necessary condition for lawful processing of special categories of data under the GDPR. Consent can be withdrawn at any time without providing a reason, but it does not affect the lawfulness of processing based on consent before its withdrawal.
- d. Explicit consent through an affirmative action – if the sender requests information about the Data Controller's brand, products, or services, the response will include the requested information, and sending the inquiry will signify consent to receive commercial information from the Data Controller at the provided email address, as necessary to respond to the request (Article 10 of the Act on Providing Services by Electronic Means). Consent can be withdrawn at any time without providing a reason. However, commercial information sent after the inquiry and before the withdrawal of consent will be lawful. Withdrawing consent may prevent providing a full response to the question posed.
- e. Legitimate interest of the data controller for claim management or defense – in accordance with applicable legal provisions, particularly the Civil Code (Article 6(1)(f) and Article 9(2)(f) of the GDPR).

#### **IV. Recipients of Personal Data Contained in Electronic Correspondence**

The Administrator may disclose the content of correspondence only for the purpose of pursuing claims within the framework of legal proceedings and to entities cooperating with the Administrator based on written data processing agreements. This disclosure is for the performance of specific tasks and services on behalf of the Administrator, particularly in the following areas: email or traditional mail handling, hosting, IT services, debt collection, legal services, and administrative support.

#### **V. Rights of Data Subjects**

1. Every data subject has the right to:

- **Access** – Obtain confirmation from the Administrator regarding whether their personal data is being processed. If the data is being processed, the data subject is entitled to access the data and receive the following information: the purposes of processing, the categories of personal data, the recipients or categories of recipients to whom the data has been or will be disclosed, the data retention period or the criteria used to determine it, the right to request rectification, erasure, or restriction of processing, and the right to object to such processing (Article 15 of the GDPR).
  
- **Obtain a Copy of the Data** – Request a copy of the data being processed. The first copy is provided free of charge, while the Administrator may charge a reasonable fee for additional copies to cover administrative costs (Article 15(3) of the GDPR).
- **Rectification** – Request the rectification of inaccurate personal data or the completion of incomplete data (Article 16 of the GDPR).
  
- **Erasure of Data** – Request the erasure of personal data when the Administrator no longer has a legal basis for processing or when the data is no longer necessary for the purposes of processing (Article 17 of the GDPR).
  
- **Restriction of Processing** – Request the restriction of processing of personal data (Article 18 of the GDPR) when:
  - a. The data subject disputes the accuracy of the personal data – for a period enabling the Administrator to verify the accuracy of the data.
  - b. The processing is unlawful, and the data subject opposes erasure, requesting the restriction of its use.
  - c. The Administrator no longer needs the data, but the data is required by the data subject for the establishment, exercise, or defense of legal claims.
  - d. The data subject has objected to processing – until it is determined whether the legitimate grounds of the Administrator override those of the data subject.
  
- **Data Portability** – Receive personal data concerning them in a structured, commonly used, and machine-readable format, which they have provided to the Administrator, and request the transfer of these data to another Administrator if the data is processed based on the data subject's consent or a contract and if the data is processed by automated means (Article 20 of the GDPR).
  
- **Objection** – Object to the processing of their personal data for the legitimate interests of the Administrator, based on their particular situation, including profiling. In such cases,

the Administrator will assess whether there are overriding legitimate grounds for processing that prevail over the interests, rights, and freedoms of the data subject or grounds for establishing, exercising, or defending claims. If the interests of the data subject are found to outweigh those of the Administrator, the Administrator will be obliged to cease processing the data for those purposes (Article 21 of the GDPR).

- **Withdrawal of Consent** – Withdraw consent at any time and without providing a reason. However, the processing of personal data conducted before the withdrawal of consent will remain lawful. Withdrawal of consent will result in the cessation of processing by the Administrator for the purpose for which consent was given.

2. To exercise the above rights, the data subject should contact the Administrator using the provided contact details and specify which right they wish to exercise and to what extent.

## **VI. President of the Personal Data Protection Office**

The data subject has the right to lodge a complaint with the supervisory authority, which in Poland is the President of the Personal Data Protection Office, headquartered in Warsaw at Stawki 2. The office can be contacted in the following ways:

- a. **By Mail:** Stawki 2, 00-193 Warsaw, Poland;
- b. **Via the Electronic Mailbox:** Available on the website at <https://www.uodo.gov.pl/pl/p/kontakt>;
- c. **By Phone:** (22) 531 03 00.

## **VII. Data Protection Officer**

In any case, the data subject may also contact the Administrator's Data Protection Officer directly:

- a. **By Email:** at the email address: [iod@stat.haus](mailto:iod@stat.haus);
- b. **By Mail:** to the above-mentioned postal address with the notation: Data Protection Officer.

## **VIII. Legal Acts Referenced in the Clause**

1. GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (Official Journal of the European Union L 2016 No. 119, p. 1);
2. Article 10 of the Act of 18 July 2002 on Providing Services by Electronic Means (consolidated text: Journal of Laws 2020, item 344, as amended);
3. Articles 118 and following of the Act of 23 April 1964 – Civil Code (consolidated text: Journal of Laws 2023, item 1610, as amended).