

Information clause in connection with the provision of electronic communication

This information clause is intended to inform about the principles of personal data processing by RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E, 26-660 Jedlińsk https://radmot.com/contact in connection with the provision of electronic communication services, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and applicable national and European regulations.

1. Personal data administrator

The administrator of personal data is RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E https://radmot.com/contact. The Administrator is responsible for the security of personal data and their processing in accordance with applicablelaw. The administrator can be contacted at the following e-mail address: biuro@radmot.pl

2. Data Protection Officer (DPO)

Data Protection Officer at RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E Izabela Remjasz, who can be contacted at the correspondence address of RADMOT Spółka z Ograniczoną Odpowiedzialnością with its registered office in Wola Gutowska 33E and at the email address biuro@radmot.pl

3. Purposes of personal data processing

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E processes users' personal data for purposes consistent with applicablelaw, including:

- performance of a contract for the provision of electronic communication services: the data is processed for the purpose of concluding, performing and servicing contracts for telecommunications services, including fixed-line telephony services, mobile telephony services, Internet access and VoIP services (Article 6(1)(b) of the GDPR);
- 2) customer service and complaint processing: the data is processed for the purpose of handling customer requests, responding to inquiries, handling complaints and providing technical support (Article 6(1)(b) and (c) of the GDPR);
- 3) direct marketing: the data is processed for marketing purposes, including sending commercial information, special offers, promotions and newsletters regarding products and services of RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E., only on the basis of the consent given. As part of its marketing activities, RADMOT Sp. zo.o. with its registered office in Wola Gutowska 33E uses analytical techniques, customer segmentation and content personalization, which allows for better matching of offers to the needs of users (Article 6(1)(a) of the GDPR);
- Ensuring the security of networks and services: The data is processed to protect telecommunications networks and systemsfrom abuse, cyber-attacks and other threats, and to ensure the integrity, confidentiality and availability of the services provided. The data processing is carried out within the framework of the legitimate interest of the controller and on the basis of detailed regulations on network security (Article 6(1)(f) of the GDPR);
- 5) fulfillment of legal obligations: RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E processes data in order to fulfil obligations resulting from the provisions of law, including regulations on accounting, taxes, documentation storage, retention of telecommunications data and in response to requests of authorized public authorities, e.g. in connection with conducting penal-fiscal or investigation proceedings (Article 6(1)(c) of the GDPR);



Market analysis and research: the data is processed for the purpose of analysing the quality and efficiencyof the services provided, surveying customer satisfaction, analysing market trends and evaluating the effectiveness of marketing activities. The data is also used to improve services and develop new products (Art. 6 (1) (f) GDPR).

4. Scope of processed personal data

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E processes personal data covering various categories, depending on the purpose of m.in processing:

- identification data: name, surname, PESEL number, number and series of an identity
- 2) contact details: address of residence, correspondence address, telephone number, e-mail address;
- contract and service data: subscriber number, contract date, service and payment history, 3) billing details, call, data and location (AML) information;
- technical data of devices: IP address, device identifiers, device type, operating system version, system logs, data on errors and network failures;
- data on user activity: data from cookies, browsing history of websites of RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E, data on interactions with online services, setting marketing preferences;
- 6) Data related to your behavior and preferences: data on how often you use the services, analytics on the useof specific functions, preferences on communication channels, information about the products and services you choose.

5. Recipients of personal data

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E may share personal data with the following categories of recipients:

- data processors commissioned by the Controller: we cooperate with IT service providers, hosting companies, payment operators, technical service companies, as well as business partners supporting the provision of telecommunications services. Data processing agreements are concluded with each of these entities, which specify obligations in the field of personal data protection in accordance with the GDPR;
- public authorities: data may be made available to law enforcement authorities, the Office of Electronic Communications (UKE), the Office for Personal Data Protection (UODO), as well asother authorities supervising and enforcing legal provisions, if it results from legal obligations incumbent on RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E
- entities providing legal and advisory services: in order to fulfil legal obligations and defend the rights and interests of RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E, may make data available to law firms, auditors and consulting companies that provide services to RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E.;
- Marketing service providers: If the user gives their consent, the data may be transferred to entities implementing advertising campaigns, analyzing the effectiveness of marketing activities and adjusting marketing messages to user preferences.

6. Period of storage of personal data

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E stores personal data for the period necessary to achieve the purposes for which the data were collected, in accordance with the following rules:

data processed for the purpose of performing the contract: stored for the duration of the contract and for the time required by law, e.g. for accounting, tax and archiving purposes (5 years from the end of the tax year);



- data processed on the basis of consent: stored until the user withdraws their consent, whereby the withdrawal of consent does not affect the lawfulness of the processing that took place before its withdrawal;
- network and service security data: stored for the period necessary to ensure the security of systems, prevent fraud and protect against cyber threats, usually for up to 2 years;
- data processed for analytical and marketing purposes: stored for the period of the contract's activity or until an effective objection to the processing for these purposes is raised:
- data processed as part of legal obligations: stored for the period indicated in the relevant 5) provisions of law, e.g. billing data may be stored for the period specified by the Electronic Communications Law and other applicable regulations.

7. Rights of the data subject

Each person whose personal data is processed by RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E., has the right to:

- access to data: you have the right to obtain confirmation as to whether or not your data is being processed, and if so, to receive a copy of the data and additional information about the processing;
- 2) rectification: the possibility of correcting incomplete, outdated or incorrect data;
- erasure (right to be forgotten): the right to request the erasure of data in cases specified by law, e.g. when the data are no longer necessary for the purposes for which they were collected or when the processing was unlawful;
- 4) restriction of processing: the right to request the restriction of processing in certain situations, such as when you contest the accuracy of the data or object to its processing;
- data portability: the right to receive your personal data in a structured, commonlyused format and to transfer it to another controller;
- object to processing: the right to object to the processing of data on the basis of the legitimate interest of the controller, including for marketing purposes;
- Withdraw consent: the right to withdraw consent to the processing of your data at any time, without affecting the lawfulness of the processing carried out before its withdrawal.

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E provides the possibility of exercising the above rights in an easy and transparent manner. Requests can besent to the email address: biuro@radmot.pl or by contacting the Data Protection Officer.

8. Automated decision-making, including profiling

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E. does not use automated decision-making, including profiling, in order to better match offers and marketing activities to the needs and preferences of users.

9. The right to lodge a complaint with the supervisory authority

Users have the right to lodge a complaint with the President of the Office for Personal Data Protection (UODO) if they believe that the processing of their personal data by RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E violates the provisions of the GDPR. Contact with the Personal Data Protection Office is possible at: 2 Stawki Street, 00-193 Warsaw, e-mail: kancelaria@uodo.gov.pl, phone: +48 22 531 03 00.



10. Obligation to provide data and consequences of failure to provide data

Providing personal data is voluntary, but necessary for the conclusion and performance of the contract for the provision of electronic communication services. Failure to provide the data required in the process of concluding the agreement may prevent the use of the services of RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E. In the case of data processing on the basis of consent, its lack or withdrawal does not affect he performance of the contract, but may limit access to additional services, such as personalized offers or marketing information.

11. Transfer of data outside the European Economic Area (EEA)

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E does not transfer personal data outside the European Economic Area (EEA). In exceptional situations, if such a transfer proves necessary, e.g. in connection with the use of cloud providers, the data will be transferred on the basis of standard contractual clauses approved by the European Commission or other GDPR-compliant mechanisms ensuring an adequate level of data protection.

12. Technical and organizational measures for data protection

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E uses advanced technical and organizational measures to protect personal data, including encryption, anonymization, pseudonymization, systems of protection against unauthorized access as well as regular audits and monitoring of IT systems. These procedures are designed to ensure the integrity, confidentiality and availability of the processed data.

13. Cooperation with supervisory authorities and response to data breaches

RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E applies procedures for responding to personal data breaches, including reporting incidents to the Personal Data Protection Office in cases required by law and informing data subjects about breaches. As part of cooperation with supervisory authorities, RADMOT Sp. z o.o. with its registered office in Wola Gutowska 33E undergoes regular audits, reviews and inspections in order to ensure compliance with applicable law.