

Apator S.A. Information Notice for participants of the Apator Academy

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation, hereinafter: the Regulation) Apator S.A. provides the following information:

Data Controller	Apator S.A. ul. Gdańska 4A, unit C4, 87-100 Toruń
Contact details of the Controller	You can contact the Controller: <ul style="list-style-type: none"> • in person • by email: apator@apator.com • by telephone: +48 56 619 11 11 • in writing: ul. Gdańska 4A, unit C4, 87-100 Toruń
Data Protection Officer	A Data Protection Officer has been appointed at Apator S.A., who can be contacted: <ul style="list-style-type: none"> • in writing to the Controller's address, • by email: iod@apator.com The Data Protection Officer may be contacted regarding all matters relating to the processing of personal data and the exercise of rights under the Regulation.
Categories of data	The Controller processes, in particular, the following categories of your personal data: <ul style="list-style-type: none"> • identification data (e.g. first name, surname), • contact details (e.g. telephone number, email address), • company name, • VAT number • student number • name of school/university.
Source of data	The Controller obtains your data: <ul style="list-style-type: none"> • directly from you
Purposes of processing and legal basis for processing	The Controller will process your data for the purpose of: <ol style="list-style-type: none"> 1) registering and maintaining an account with the Apator Academy and enabling you to use the materials posted there (legal basis: Article 6(1)(b) of the Regulation), 2) contacting you regarding matters related to the operation of the Apator Academy, e.g. handling enquiries, technical support (legal basis: Article 6(1)(b) of the Regulation) 3) sending commercial information electronically, e.g. newsletters, information about products, training courses, events and educational materials (legal basis: Article 6(1)(a) of the Regulation), 4) fulfilling the legal obligations incumbent on the Controller in connection with the operation of the Apator Academy (legal basis: Article 6(1)(c) of the Regulation), 5) establishing, exercising or defending legal claims, which constitutes a legitimate interest of the Controller (legal basis: Article 6(1)(f) of the Regulation), 6) to carry out direct marketing, which constitutes a legitimate interest of the Controller (legal basis: Article 6(1)(f) of the Regulation).
Period for which the data will be stored	Your personal data will be stored: <ol style="list-style-type: none"> 1) in relation to maintaining an account on the platform – for the duration of your account, 2) in the case of data processing based on consent – until such consent is withdrawn, 3) in the case of direct marketing – until a valid objection is lodged, 4) in relation to establishing and pursuing claims or defending against claims made – until potential claims arising from the holding of an account become time-barred, 5) in relation to the fulfilment of legal obligations incumbent on the Controller and in connection with holding an account – for the period during which the law requires the Controller to retain documentation and fulfil the obligations arising therefrom, in particular: <ul style="list-style-type: none"> • for tax records – for a period of 5 years from the end of the calendar year in which the tax payment deadline expired, • for accounting records – for a period of 5 years from the end of the calendar year in which the transactions, operations and pending proceedings in this regard were completed, repaid, settled or became time-barred.
Recipients of data	For the purposes indicated above, your personal data may be disclosed by the Controller to entities authorised to receive personal data pursuant to relevant legal provisions, the Head of the National Revenue Administration (KSeF), entities providing the Controller with ICT or

	technical services, legal or advisory services, and other entities processing personal data on behalf of the Controller pursuant to data processing agreements. Your personal data may be made available to other companies within the Apator Group.
Profiling and automated decision-making	Your personal data will not be processed by automated means, including profiling.
Rights of the data subject	<p>In accordance with the Regulation, you have the right to:</p> <ol style="list-style-type: none"> 1) obtain confirmation as to whether your data is being processed by the Controller, as well as the right to access your data (Article 15 of the Regulation), 2) rectify and complete your data (Article 16 of the Regulation), 3) erase your data (Article 17 of the Regulation), 4) request the restriction of the processing of your data (Article 18 of the Regulation), 5) to have your data transferred (Article 20 of the Regulation). <p>You have the right to object at any time – on grounds relating to your particular situation – to the processing of your data for the purposes of the Controller’s legitimate interests. In such a case, the Controller may process the data provided that it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or grounds for the establishment, exercise or defence of legal claims (Article 21(1) of the Regulation).</p> <p>To the extent that the basis for the processing of your personal data is consent, you have the right to withdraw it. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.</p> <p>You also have the right to lodge a complaint with the President of the Personal Data Protection Office if you suspect that the processing of your personal data infringes data protection regulations.</p>
Transfer of data to a third country or an international organisation	As a general rule, your personal data will not be transferred outside the European Economic Area (hereinafter “EEA”). However, in view of the services provided by the Controller’s subcontractors in the provision of support for ICT services and IT infrastructure, the Controller may commission recognised subcontractors operating outside the EEA to carry out specific IT activities or tasks, which may result in your data being transferred outside the EEA. Individual countries outside the EEA, within whose territory your personal data will be processed, ensure an adequate level of personal data protection in accordance with EEA standards, as determined by the European Commission. However, in the event of processing within the territory of countries for which the European Commission has not determined an adequate level of personal data protection, the Controller enters into agreements with the recipients of your personal data to ensure an adequate level of such protection. The agreements referred to above are based on standard contractual clauses issued by the European Commission in accordance with Article 46(2)(c) of the GDPR. A copy of the standard contractual clauses referred to above may be obtained from the Controller. The method used by the Controller to secure your data complies with the principles set out in Chapter V of the GDPR. Accordingly, you may request further information about the security measures applied in this regard, obtain a copy of these measures, and information on where they are made available.
The provision of personal data processed by the Controller is voluntary but necessary for registration at the Apator Academy. Failure to provide such data will prevent the creation of an account.	