

GDPR – INFORMATION OBLIGATION

Based on Article. 13 par. 1 and par. 2 and art. 14 par. 1 and par. 2 of 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 95/56/EC (hereinafter: "GDPR") which shall come into force on May 25th, 2018, we inform you about the manner and purpose in which we process your personal data (hereinafter referred to as "data"), as well as your rights related to data protection.

1. Who is responsible for data processing and how can you contact us?

The controller of your data is LED Labs spółka z ograniczoną odpowiedzialnością, based in Kraków, Poland (hereinafter referred to as "LED Labs"), which can be contacted:

- in writing, by sending correspondence to the following address:
LED Labs Sp. z o.o., ul. Zakopiańska 2C, 30-418 Kraków, Poland
- by phone, at the number:
+48 12 633 44 11
- by e-mail, at:
info@led-labs.pl

2. Why, to what purpose and on what legal basis do we process your data?

We process your data in accordance with the provisions of the GDPR and Polish data protection regulations. We do this in particular in order to:

- a) conclude and perform the contracts concluded with you and to take steps at your request prior to entering into a contract - pursuant to art. 6 par. 1 point b) of GDPR;
- b) conduct direct marketing - pursuant to art. 6 par. 1 point f) of GDPR - where data processing is necessary for the purposes of the legitimate interests pursued by LED Labs;
- c) fulfillment of legal obligations, in particular of a financial and accounting nature, conducting complaint processes as well as defending against claims and pursuing claims - pursuant to art. 6 par. 1 point c) of GDPR – where data processing is necessary for compliance with a legal obligation to which LED Labs is subject, including tax law;

In addition, we process data based on your consent (Article 6 par. 1 point a) of GDPR), granted for specific purposes (eg for marketing purposes). Consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of data processing by LED Labs until the consent is withdrawn or in circumstances where LED Labs processes data based on a different legal basis than your consent.

3. Who can we transfer data to?

The data may be made available to other recipients in order to perform the contract concluded with you, in order to comply with the legal obligation imposed on LED Labs, based on your consent or for the purposes resulting from the legitimate interests pursued by LED Labs or a third party. The recipients can be, in particular: authorized LED Labs employees, other persons acting under the

authority of LED Labs, as well as authorities and institutions authorized to receive your data under applicable law.

Data is also provided to data processors acting on behalf of LED Labs and persons acting under their authority. Such entities process data on the basis of an agreement concluded with LED Labs and only in accordance with the LED Labs instructions and subject to the obligations arising from the GDPR. The entities acting in the name of and on behalf of LED Labs include in particular entities rendering services in the field of IT, legal and accounting.

4. Will your data be sent to a third country (outside the European Union)?

Data may be transferred to recipients in countries outside the European Union, if it is necessary to perform the agreement concluded between you and LED Labs or to take steps at your request prior to entering into a contract, while LED Labs uses information infrastructure (cloud computing, e-mail).

If the processing involves transfer of data outside the European Union, such transfer will take place using Standard Contractual Clauses or Privacy Shield regulations approved by the European Commission to ensure an adequate level of protection of personal data required by law.

5. How long will your data be processed (stored)?

Your data will be processed for the period necessary to achieve the purposes of processing indicated in point. 2, i.e. :

- within the scope of performance of the contract concluded with LED Labs - until the completion of its performance, and after that time for the period required by law or to secure the implementation of any claims,
- in the scope of fulfilling legal obligations of LED Labs in connection with conducting business activity and performance of concluded contracts - until these duties are fulfilled by LED Labs,
- in the scope of processing carried out solely on the basis of a consent - until the date of immediate deletion of data, based on the request made by you,
- until the purposes of the legitimate interests pursued by LED Labs that constitute the basis for such processing are fulfilled or until you object to such processing, unless there are other legally justified grounds for further processing.

6. What rights do you have to have your data protected properly?

You have the right to:

- demand access to your data, as well as demand their rectification, limitation of their processing or their removal,
- withdraw at any time the consent granted to the processing of data to the extent that this consent applies, subject to the provision that withdrawal of consent does not affect the lawfulness of data processing by LED Labs until the consent is withdrawn,
- request that the data provided by you to LED Labs and processed in order to conclude and perform the contract or processed on the basis of consent are transferred. LED Labs transfers your data by handing them out to you in a structured, commonly used machine-readable

format or sending them to another data controller, if technically possible. The right does not apply to data that is covered by company confidentiality of LED Labs,

- file a complaint to the supervisory body - which in the Republic of Poland is the President of the Office for Personal Data Protection - if you consider that the processing of your data violates the legal provisions, including the GDPR.

In addition, you have the right to object at any time to the processing of data by LED Labs on the basis and on the principles set out in Article 21 GDPR.

7. Do you have an obligation to provide data?

To the extent that the processing of your data takes place in order to perform the actions requested or to conclude and perform the agreement with LED Labs, providing your data is a condition for the execution of the requested activities or the conclusion of this agreement. Providing the data is voluntary, but it is necessary to perform the requested activities or to conclude and perform the agreement with LED Labs.

9. To what extent do we use automatic decision making, including profiling?

Your data is not subject to automated decision making, including profiling.