

LINDAB PRIVACY POLICY

1. LINDAB Spółka z ograniczoną odpowiedzialnością (limited liability company) with its registered office in Wieruchów at ul. Sochaczewska 144, 05-850 Ożarów Mazowiecki, entered into the register of entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under the KRS number: 0000043661, REGON: 810539628, NIP: 8520400158, with share capital (paid up in full) in the amount of PLN 143,621,200.00 (“**Lindab**”) undertakes to protect your personal data in line with the principles specified in applicable legal regulations, including in the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data and repealing the Directive 95/46/EC (General Data Protection Regulation) (“**GDPR**”).
2. This document provides a description of Lindab privacy policy with the purpose to identify the principles of the manner in which Lindab processes and uses your personal information. Also, this privacy policy describes your rights in relation to the personal data you have submitted and indicates how you can contact Lindab if you have any other questions regarding the processing of your personal data.
3. This privacy policy applies to all cases where Lindab is the controller of personal data and processes personal data. This applies both to cases where Lindab processes personal data obtained directly from you, and where Lindab obtained personal data from other sources. In particular, this privacy policy applies to personal data that Lindab has obtained from you via this website (and other websites administered by Lindab, e-mail or in the course of contacts via other communication channels).
4. Please thoroughly read this privacy policy.
5. Please note that by leaving this page (e.g. by being redirected through a link to a website in another domain which is not administered by Lindab), you enter an area where this privacy policy does not apply. Lindab is not responsible for the principles of privacy policy applicable on websites operated by other entities.

CONTACT

6. As regards all matters related to the protection or processing of your personal data, you can contact Lindab via e-mail to the following address: rodo@lindab.com or write to the Company's address: **Lindab Sp. z o.o., Wieruchów, ul. Sochaczewska 144, 05-850 Ożarów Mazowiecki**, in an envelope marked „Attn.: Personal Data Protection Team”).

PERSONAL DATA CONTROLLER

7. Lindab is the controller of the personal data submitted on this website, by e-mail or other communication channels (i.e. It is the entity that makes decisions on how these data will be used).

8. Lindab does its best to ensure that all your personal data are processed in accordance with the purpose for which it was collected and used in accordance with the premises and categories of processed data as permitted by law.

METHOD OF DATA ACQUISITION

9. When collecting any personal data, Lindab records their source.
10. Lindab collects personal data, in particular when:
 - a. the user of the website administered by Lindab contacts Lindab using the contact form;
 - b. the user of the website administered by Lindab opens a user account on the website (applicable to websites administered by Lindab which have such feature);
 - c. the user of the website administered by Lindab subscribes to marketing communications (newsletter);
 - d. the user of the website administered by Lindab declares participation in a training, conference, contest or other event organised by Lindab (applicable to websites administered by Lindab relative to such events);
 - e. the user of the website administered by Lindab declares participation in a loyalty programme or a promotional campaign (applicable to websites administered by Lindab relative to such events);
 - f. the data subject contacts Lindab using the e-mail address or fax provided on the website;
 - g. the natural person being the data subject submits to Lindab the personal data necessary for the conclusion and performance of the agreement.
11. Lindab collects and stores the following personal data: name and surname, registered address, address of residence, correspondence address, e-mail address, phone number, date of birth, PESEL number, computer IP address, login, as well as other personal data – if you have voluntarily submitted such data.

PURPOSE OF PERSONAL DATA PROCESSING AND LEGAL BASIS

12. Personal data processing is based on (depending on the circumstances and purpose of obtaining data):
 - a. the necessity to perform the concluded agreement;
 - b. consent (including, in particular, consent to marketing e-mails);
 - c. Lindab's justified interest as data controller (e.g. in the scope of database development, analytical and profiling operations, including operations associated with the analysis of the use of products, direct marketing of own products, securing documents for purposes of defence against potential claims or for seeking the satisfaction of claims);
 - d. obligations under the law (e.g. tax law, social security or accounting regulations).

13. The purpose, scope and recipients of personal data processed by Lindab always depend on the actions you take, i.e. on the circumstances in which you submitted the data and the legal relationship existing between you and Lindab (or the lack of such legal relationship).
14. Lindab collects and stores personal data for the following purposes:
 - a. when submitting inquiries using the contact form available on the Lindab website – personal data will be processed for one-time contact in the indicated form with the data subject in order to respond to the inquiry submitted;
 - b. when opening a user account on Lindab websites (where possible) – personal data will be processed in order to support and manage such account and to enable Lindab to provide electronic services and to fully use the website, including to perform transactions and payments. Providing this data is necessary to open and maintain a user account;
 - c. when granting consent to receive marketing communications (newsletter) – personal data will be used to present information regarding products and services offered by Lindab or Lindab Partners. Both providing data and granting such consent is voluntary, but opting out will prevent you from receiving marketing communications;
 - d. when registering for an event organised by Lindab (such as a training, conference, competition) – personal data will be used to enable participation in such an event and to enable Lindab to provide services related to the organisation of such events (e.g. providing accommodation), settlements and payments for participation and for accounting purposes related to the settlement required for such participation;
 - e. when registering for a loyalty programme or promotion – personal data will be used to enable participation in such a programme or promotion, and for accounting purposes related to the settlement required for such participation;
 - f. when placing an order for a Lindab product or service – personal data will be processed for the purpose of completing such order and for accounting purposes (including for issuing a receipt or invoice), handling of any claims arising from concluded agreements (including in the scope of quality assurance). Providing this data is necessary for the conclusion and performance of the agreement;
 - g. in each of the cases listed above – for justified purposes of Lindab as a data controller, including:
 - to manage this website and improve it for the purposes of internal records, as well as for statistical analysis;
 - for technical purposes associated with server administration;
 - direct marketing of its products and services;
 - debt collection; conducting litigation, arbitration and mediation proceedings;
 - storing data for archiving purposes and ensuring accountability (demonstrating the compliance of Lindab with its obligations under the law).

DURATION OF PERSONAL DATA PROCESSING

15. Lindab regularly verifies whether your personal data is not processed for longer than is necessary for the purposes for which the data is processed.
16. Personal data processed in connection with the presentation of an offer, provision of a service, conclusion and performance of an agreement, will be processed in accordance with applicable regulations, but no longer than until Lindab or the data subject may seek to satisfy claims related to the above.
17. Personal data processed on the basis of the consent granted will be processed until the latter is withdrawn or until the purpose for which the data was no longer exists. The consent granted may be withdrawn at any time without affecting the lawfulness of the processing carried out on the basis of the consent prior to its withdrawal.
18. Personal data provided submitted via the contact form or by phone, via fax or e-mail address, will be processed for the duration of the demand declared, e.g. presentation of the offer or provision of information, but no longer than for two years for reasons of compliance with the accountability principle.
19. Personal data processed for purposes related to direct marketing will be processed until the consent is withdrawn or an objection is made.

SECURITY AND STORAGE OF INFORMATION AND DATA PROCESSING RULES

20. Lindab ensures the security of personal data by using proper technical and organisational measures to prevent unauthorised data processing and accidental loss, destruction and damage thereof. Lindab websites and contact forms on such websites are encrypted.
21. Lindab endeavours to ensure that your personal data is processed in accordance with the personal data processing rules specified in the GDPR, i.e.:
 - a. processed in accordance with the law, reliably and in a manner transparent to you (the rule of compliance with law, reliability and transparency);
 - b. collected for specific, explicit and legally justified purposes and not further processed in a manner inconsistent with these purposes (the rule of purpose limitation);
 - c. correct and updated when necessary; personal data which will prove incorrect in the light of the purposes of the processing thereof will be promptly removed or rectified (the rule of correctness);
 - d. adequate, relevant and limited to what is necessary for the purposes for which they are processed (the rule of data minimisation);
 - e. stored in a form allowing your identification for no longer than is necessary for the purposes for which such data is processed (the rule of processing limitation);
 - f. processed so as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by means of proper technical or organisational measures (the rule of integrity and confidentiality).

SCOPE OF SHARING DATA ON USERS

22. Lindab represents that it does not sell your personal data.
23. Lindab represents that it does not share or transfer your personal data to other persons or institutions unless:
 - a. it takes place with your express consent or at your request, or
 - b. it takes place at the request of state authorities authorised under the Act for the purposes of the proceedings or operations they carry out related to security or defence, for public welfare tasks defined by law, if it is necessary to fulfil legally justified goals, or
 - c. it is required by binding provisions of law, or
 - d. it is done in relation to entities from the Lindab capital group, in particular for the purposes of settlements made jointly by the group and for statistical and marketing purposes, or
 - e. where it is necessary to perform the agreement concluded with you, i.e. sharing data with e.g. debit card service providers to carry out your payments via such website or entities that deliver products you ordered in Lindab, as well as to Lindab subcontractors, or
 - f. it is necessary in order to ensure the proper operation of Lindab websites, i.e. sharing data with e.g. services providers designated by Lindab, who provide services related to this website or its functionalities, only, however, to the extent necessary for the provision of such services, and with IT service providers who deliver hosting and design, development and provide support in the scope of operation of the website, or
 - g. it is necessary for the performance of duties associated with bookkeeping, i.e. sharing data with e.g. auditors, chartered accountants, legal and tax advisors, or
 - h. it is necessary for claim settlement, i.e. sharing data with e.g. debt collection companies, advisors and law firms, judicial authorities, or
 - i. where a transaction is planned involving shares in Lindab or Lindab business, and the entity interested in acquiring shares in Lindab or its business requires data to be shared with it.

TRANSFER OF YOUR DATA OUTSIDE THE EEA

24. Lindab informs that personal data processed by Lindab are generally not transferred outside the EEA (European Union Member States and Norway, Iceland and Liechtenstein) except where (potentially):
 - a. Lindab uses servers located outside the EEA (in which case any data of yours will be sent to this server and then sent back to Lindab, and Lindab will take measures to ensure that the server guarantees an adequate level of security for your personal data),

- b. entities or servers based outside the EEA join the Lindab capital group, where the data will be shared with such entity in accordance with item 23 d) above.
25. Lindab will take measures in order to protect all your personal data shared with such third party or transferred to other countries in accordance with applicable data protection provisions, in particular when your personal data is transferred to countries outside the EEA, Lindab will apply standard contractual clauses approved by the European Commission in order to ensure an adequate level of protection of your personal data. Standard contractual clauses are available at the link below: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

AUTOMATIC PERSONAL DATA PROCESSING

26. Lindab can process your personal data using automated means (including in the form of profiling). This will not make you incur any legal consequences or substantially affect your situation in any similar way.
27. Profiling is particularly important to Lindab, we want you to know that:
- a. Lindab does not process any sensitive data for the purposes of profiling,
 - b. for the purposes of profiling, Lindab only processes data that had previously been pseudonymised or data that we had aggregated,
 - c. if we cannot achieve the goal other than by profiling non-pseudonymised or non-aggregated personal data, Lindab uses standard data for this purpose, such as e-mail and IP address or cookies;
 - d. Lindab uses profiling to analyse or predict your preferences and interests in connection with the use of Lindab products or services;
 - e. Lindab uses profiling for marketing purposes, i.e. to match the marketing offer to said preferences.

YOUR RIGHTS RELATIVE TO PERSONAL DATA

28. You have the right to obtain information about the processing of your personal data and the right to access such data.
29. You can request your personal data to be corrected, deleted or supplemented at any time. However, please note that such data deletion may prevent Lindab from responding to your inquiries or completing your order, or it will make your account no longer valid, or prevent you from participating in an event organised by Lindab (such as a training, conference, competition), a loyalty program or promotion.
30. You have the right to request a copy of your personal data from our resources.
31. You have the right to request the limitation of your personal data processing or to request that Lindab stops using your personal data or stops the use of profiling (for example in relation to the use of data to improve our website).

32. You have the right to obtain your personal data used to complete the order, manage your account and the like, which were provided as part of contacts with Lindab, in a machine readable format, which you have the right to transfer to another data controller.
33. If the processing of your personal data is conducted based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of the processing conducted based on the consent before its withdrawal.
34. Your rights may be subject to restrictions or be exercised under certain conditions. For example, Lindab cannot guarantee that in you will always have the right to transfer data in a particular case; this depends on the specific circumstances of the processing operations.
35. Lindab has no obligation to delete data when processing is necessary for the following purposes:
 - a. exercise of rights and freedoms of expression and information,
 - b. compliance with the legal obligation of processing arising from applicable law, or performing a public welfare task,
 - c. archival purposes that are in the public interest, scientific or historical research purposes or statistical purposes,
 - d. to establish, seek or defend claims.
36. Lindab reserves the right to exercise said rights after successfully verifying your identity in the process of applying for a relevant operation to be performed.
37. If you have a complaint regarding the processing of your personal data by Lindab, you have the right to report your dissatisfaction to the appropriate supervisory body competent in the scope of the processing of personal data by Lindab (currently: President of the Office for the Protection of Personal Data).

COOKIE POLICY

38. A 'cookie' is a small text file containing information which is stored on your computer. Cookies are only used for technical reasons and to facilitate your use of a website. One type of cookie will save a file permanently on your computer ("permanent cookies"). It can thereafter be used to customise this website based on the user's choices and interests. Another common type of cookie is the "session cookie". When you visit a website, session cookies are sent between your computer and the server to collect information. Session cookies are not saved once you close your web browser. For more information about how cookies work, please visit www.allaboutcookies.org.
39. The cookies that Lindab uses on this website are the following (the duration of cookie storing is specified within parentheses after each item):
 - a. .ASPXROLES (session) – a cookie which stores role names for users in order to identify the role of the logged-on user. Only used for websites with a password protected area.

- b. .ASPXAUTH (session) – used in order to determine if a user is authorised to access or not and, only once a user has logged on. Only used for websites with a password protected area.
- c. .LoginC (session) – used to check which user is logged on. Only used for websites with a password protected area.
- d. backgroundImageIndex (session) – used for the reference home page to set up the starting image of the slideshow.
- e. ASP.NET_SessionId (session) – ASP.NET uses this cookie to keep track of requests sent during a session. It enables the retention of and separation of different users. Only used for websites with a password protected area.
- f. cookieCK/ cookieJS (one year) – stores information on the user closing the notification on cookie use.

40. Lindab is continuously working on improving its websites. In order to do this, we use Google Analytics to analyse our users behaviour on a general and anonymous level. We also allow Google Analytics to place and manage cookies on this website. The following cookies are placed by Google Analytics to record data about visits and visitors of this website; the statistics are used to improve the user experience of this website in terms of ease and smoothness of use:

- _utma (two years) – (unique) user – cookie saved on computers when you first visit a website; it contains a unique identification number which allows the tool to identify a unique user and a new user;
- _utmz (six months) – contains information on visit sources, which makes it possible to count visits from search engines and data from marketing campaigns;
- _utmc (session) – contains only information on the unique website identifier and expires after closing the browser window (it is a temporary cookie);
- _utmb (30 minutes) – responsible for storing information on a particular visit; cookie _utmc cooperates with _utmb, its task is to determine whether to start tracking a new visit or rather classify the data collected under the previous one;
- _utmt (ten minutes) – allows for identifying Google Analytics events;
- _ga (2 years) – designed to distinguish users for the purposes of collecting information on visits on the website, helps identify areas of the website that need improvement;
- _gid (1 day) – used to differentiate individual sessions (visits), it is renewed each time after sending data to Google Analytics;
- _gat (10 minutes) – used to monitor the query rate in relation to own servers.

41. If you do not accept Lindab using cookies when you use its website, you can change your web browser's settings to automatically deny the storage of cookies or to notify you when a website wants to store cookies on your computer. You can also delete previously stored cookies from the web browser (for more information on how to do it, see below). Please note that certain areas and functions on this website require cookies and may not function if cookies are deleted or declined.
42. If you wish to remove the cookies that are already on your devices, and you are using a PC and a newer browser, you can press CTRL + SHIFT + DELETE simultaneously. If this shortcut does not work, you can find the support pages for the most commonly used browsers as well as a link to delete flash cookies here:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Safari](#)
- [Opera](#)
- [Cookie Flash files](#)

43. For more information regarding the cookies used on this website please contact us at info@lindab.pl.
44. Websites can make use of widgets for social media which allow users to access content from Lindab website on various social media platforms (including Facebook, YouTube, Twitter, LinkedIn). To better understand how and what information is collected via social media and what cookies are used by such third party, please read the current privacy policy for each of the social platforms respectively.

CHANGES TO THE PRIVACY POLICY AND COOKIE POLICY

45. Lindab undertakes to review this privacy policy and cookie policy on a regular basis and to modify it if it proves necessary for the following reasons: new legal regulations, new guidelines of bodies responsible for supervising the processes of personal data protection, practices pursued in the area of personal data protection.
46. Lindab also reserves the right to change this privacy policy and cookie policy as a result of a change in the technology which it uses to process personal data (if, and to the extent that such change affects the wording of this document), and as a result of a changes to the methods, purposes or legal bases of processing by Lindab of personal data.

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