



Privacy Policy for Contractors

When CityFit Group companies enter into contracts, we sometimes ask our Contractors to provide individuals acting on their behalf or representing them with information about the processing of their personal data. The following content relates to such a request and fulfils an information obligation towards those individuals. In this document we refer to these individuals as "you".

This policy supplements the CityFit Group Privacy Policy and describes your rights and how our Group Companies process your personal data. It explains the issues described in Articles 13, 14 and 26 of the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR").

If you have any concerns regarding this Policy, please feel free to contact us at the following email address iod@cityfit.pl.

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Which Companies does the Privacy Policy for Contractors apply to?

This notice relates to personal data that is processed by:

- (a) a specific **company of the CityFit capital group** entering into a contract with a contractor - as an independent controller of personal data;
- (b) **CityFit Group companies** - as joint controllers of contractors' data, gathered within the common contractor database of CityFit Group.

The CityFit Group Companies (collectively the "**Companies**" or "**we**") are listed in Appendix 1 of the CityFit Group Privacy Policy.

Contact with the Data Protection Officer

In matters related to the protection of personal data, you may contact the Data Protection Officer (Jacek



Grabowski), the Deputy Data Protection Officers, or the person responsible for data protection at the e-mail address indicated in Appendix 1 of the CityFit Group Privacy Policy.

Sources and scope of data collection

We have received your data because you represent, act for or on behalf of the Contractor and we have received the data from you, we have been given the data by the Contractor or we have collected the data from publicly available records (e.g. data of persons representing the Contractor indicated in the contract details).

In relation to a current or planned cooperation, we may process personal data such as:

- i. name and surname, company, business address and correspondence addresses,
- ii. numbers in relevant registers (e.g. NIP or REGON number, PESEL number),
- iii. contact data, such as e-mail address or telephone or fax number,
- iv. your function within the Contractor's organisation,
- v. your experience, qualifications or references,
- vi. bank account number;
- vii. financial and accounting data.

The data will be processed by CityFit Group Companies as joint controllers of the data for the purpose of creating a joint contractor database. The data may be used by the Joint Controllers for the purposes indicated below, also for the purpose of contacting you (e.g. sending a letter of enquiry, placing an order, etc.).

For what purposes and for how long is your data processed?

We only process personal data for the specified purpose and to the extent necessary to fulfil that purpose. The main purposes, legal bases and periods for which we process personal data are listed below.

Purpose of processing	Description	Legal basis	Processing period
Implementation of obligations imposed by legislation	This includes the activities that the law requires of the controller and, if the law imposes obligations on the Group, the legal obligations of the CityFit Joint Controllers, the conduct of financial and accounting activities by the Joint Controllers in a common database for the entire CityFit Group;	Fulfilment of a legal obligation incumbent on the Controller (Art. 6(1)(c) GDPR), in terms of conducting joint financial and accounting activities - fulfilment of the Joint Controllers' legitimate interest (Art. 6(1)(f) GDPR)	In accordance with the periods required by law, generally 6 years from the end of the calendar year, starting from the following year in which the event giving rise to the legal obligation occurred, and, as far as the legitimate interests of the Joint Controllers are concerned, for the same period as the Controller.



Performance of the contract	Undertaking working contacts for the purpose of performing the contract with the contractor, sending out letters of enquiry, preparing and negotiating the contract, handling complaints and queries	Performance of a contract (Art. 6(1)(b) GDPR) - if the Contractor is the data subject; otherwise, the legal basis is to pursue the legitimate interest of the Joint Controllers (Art. 6(1)(f) GDPR)	Duration of the contract between the Contractor and the Controller
Establishment, exercise and defence of claims	Verification of credibility, verification in public registers	The legitimate interests of the Joint Controllers (Article 6(1)(f) GDPR)	We process the data for the relevant limitation periods, i.e. in principle no longer than 3 years after the event giving rise to the claim
Statistics	Conducting statistics, internal reporting and internal audit in the CityFit Group; developing and improving the services of the Joint Controllers	The legitimate interests of the Joint Controllers (Article 6(1)(f) GDPR)	Until the objection is accepted

Who can we make your data available to?

In connection with the activities of the Joint Controllers, your personal data may be entrusted to and made available to the following entities:

1. other contractors or subcontractors involved in the performance of the contract,
2. entities that help provide the Joint Controllers' services to you;
3. third party audit or inspection entities to the Joint Controllers;
4. IT system providers (including those who maintain a shared contractor database) and analytical and hosting services;
5. the Economic Information Bureau,
6. financial institutions participating in the process of implementation and settlement of the contract;
7. entities providing debt collection services;
8. entities providing document archiving services;
9. courier companies and postal operators,
10. insurance companies, consultancies, auditors and law firms;

What rights do you have?

You have the right to:

1. request access to the content of your personal data,
2. request data rectification,



3. request data deletion,
4. request the restriction of data processing
5. request data portability,
6. object to the processing of your data,
7. withdraw consent for processing at any time without affecting the legality of processing performed on the basis of consent before its withdrawal.

You have the right to lodge a complaint with the President of the Personal Data Protection Office (to the address of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw, more contact information at <https://uodo.gov.pl/pl/p/kontakt>), if you consider that the processing of personal data concerning you violates the provisions of the GDPR.

Main content of the arrangement between the Joint Controllers

As we operate on a jointly controlled basis, we have entered into an agreement to this effect. Each of the Joint Controllers takes due care to ensure the security of the processing of your data and you can approach each of them with questions. We divide our tasks as follows:

The Company with which you have concluded a contract is responsible to you for the performance of the Contract. The Joint Controllers carry out accounting and financial activities (e.g. billing issues, invoicing) within a single, coherent contractor database and Keen Property Management sp. z o.o. is responsible for the maintenance of this database. Each of the Joint Controllers, on the other hand, provides knowledge and experience to ensure that you get the best possible satisfaction from your relationship with CityFit Group. If you are interested in the other main content of the agreement between the Joint Controllers, we will provide you with such information upon request. You are welcome to contact us in accordance with the section "Contact point of the Joint Controllers".

Contact point of the Joint Controllers

The Joint Controllers have agreed that the point of contact for the protection of your personal data is **CityFit Management sp. z o.o.** You may exercise the above rights by writing to the following address:

CityFit Management sp. z o.o.

al. Jana Pawła II 27

00-867 Warszawa

marked „do Inspektora Ochrony Danych” (“to the Data Protection Officer”),

or by sending an e-mail to CityFit Group Data Protection Officer: iod@cityfit.com

Information on data provision requirements

Providing the data is necessary for the conclusion and performance of the contract or for the cooperation between us and the Contractor. The consequence of failing to provide the data is the impossibility of cooperation (for example, failure to provide the data may result in the impossibility of performing the contract or issuing an invoice).



Change in Privacy Policy for Contractors

We want to ensure that the Privacy Policy complies at all times with current legal requirements, new guidelines from data protection authorities and reflects the current data processing processes at CityFit Group. Therefore, this Privacy Policy for Contractors may be subject to change. If required by law, any information regarding changes that may affect you will be communicated to you through the appropriate form of communication typically used by CityFit Group in dealing with Contractors.