



Information duty for contact persons indicated by carriers in connection with conclusion of the agreements for wholesale services

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 95/46/EC (**General Data Protection Regulation, GDPR**) has been in force in the European Union since May 25, 2018.

The implementation of GDPR is an opportunity to inform you how we protect and process your personal data and what rights you have in this regard.

The changes introduced as part of GDPR do not require you to contact Orange. Please read the information below.

How do we process your personal data?

Your personal data have been indicated by a carrier using Orange Polska's wholesale services. We therefore process your personal data such as first name, last name, e-mail address or telephone number.

Orange Polska S.A. is the controller of your personal data – which means that we are responsible for using data in a secure manner, in accordance with the wholesale agreement and applicable law.

1. For what purpose and on what basis do we use personal data?

We use the personal data obtained from your carrier in order to conclude and perform a wholesale agreement between us and the carrier, including to install the service and remove failures for the duration of the wholesale agreement (legal basis: Article 6(1)(f) of GDPR; we will further refer to this basis as "*our legitimate interest*").

2. Which data must be provided to us by our partner?

We require the provision of contact persons's data such as: first name, last name, e-mail address or telephone number to perform the wholesale agreement concluded between us and the carrier.

Providing data to Orange Polska when concluding a wholesale agreement is not a statutory requirement.

3. To whom may the personal data be transferred?

- a) entities processing data on our behalf, participating in performing our activities:
 - a. supporting our ICT systems or making ICT tools available to us,
 - b. subcontractors supporting us for example when providing telecommunications services, assembling equipment or handling correspondence,
 - c. entities supporting and maintaining our telecommunications network.
- b) other controllers processing your data on their own behalf:
 - a. entities providing postal or courier services in relation to handling your queries and requests,

- b. other telecommunications carriers with which Orange Polska has signed wholesale agreements, in the scope in which it results from performing regulatory obligations imposed by President's of the Office of Electronic Communications administrative decisions.

4. Will the data be processed outside the European Economic Area?

We do not plan to transfer your data outside the European Economic Area (which includes the European Union, Norway, Liechtenstein and Iceland), or to international organizations.

5. Automated decision making

We do not use your data to make automated decisions which could significantly affect you.

6. Your rights

You may file a request with us for:

- rectification (correcting incorrect data),
- erasure (erasure of data processed without basis),
- restriction of processing (suspending data operations until completing the processing of the request for objection or rectification or non-erasure of your data which we no longer need),
- access to data (for information about data processed by us and a copy of the data),
- data portability to another controller or to you, if we process data which have been provided to Orange directly by you.

You may exercise these rights by submitting a request in writing to:

Orange Polska S.A.
ul. Jagiellońska 34,
96-100 Skierniewice

To make sure that we process your request addressed to us, we may ask you to provide additional information enabling us to authenticate the applicant.

The scope of any of these rights, and situations in which you may exercise them, result from GDPR. Full GDPR text is available at eur-lex.europa.eu and <http://www.hurt-orange.pl/personal-data-protection/>

7. Right to object

In particular situations, you may at any time object to processing your personal data (including profiling) by us based on our legitimate interest or based on public interest.

In such case, after considering your request, we will no longer be able to process your personal data covered by the objection, unless we prove that there are:

- important legitimate grounds for data processing which override your interests, rights and freedoms, or
- grounds for establishment, exercise or defence of legal claims.

8. Consent

If our use of your data is not necessary for the conclusion or performance of a contract, performance of a legal obligation or does not constitute our legitimate interest, we may ask you for consent to certain manners of using your data. Such consent may concern e.g. automated decision making based on your data, on your demand. Consent may be withdrawn at any time (this will not affect the lawfulness of data use before its withdrawal).

9. Complaint

You may lodge a complaint with the President of the Office of Personal Data Protection if you consider that the processing of personal data infringes legal provisions.

Our contact details:

Our registered office address is:

Orange Polska S.A.
Al. Jerozolimskie 160,
02-326 Warszawa

Our address for correspondence (for all requests submitted in order to exercise your rights):

Orange Polska S.A.
ul. Jagiellońska 34,
96-100 Skierniewice

Contact details of Orange Polska S.A.'s Data Protection Officer: inspektorochronydanych@orange.com

More information

To learn more about how we use and protect your data, or about your rights, please visit the website: <http://www.hurt-orange.pl/personal-data-protection/>