



Privacy notice

for natural persons who are Contractors, or representatives of Contractors, of ORLEN Group Companies and whose details are shared across ORLEN as part of the Trade Credit Centralisation

(In fulfilment of the data protection notification obligation under Article 14(1) and 14(2) of the General Data Protection Regulation of April 27th 2016)

1. The controller of your personal data is ORLEN S.A., with its registered office at ul. Chemików 7, Płock, Poland (“**ORLEN S.A.**”). You can contact the data controller at the following telephone numbers: (+48 24) 256 00 00, (+48 24) 365 00 00, (+48 22) 778 00 00.
2. You can contact the Data Protection Officer at ORLEN S.A. by email at the following address: daneosobowe@orlen.pl. You can also contact the Data Protection Officer by letter sent to ORLEN S.A.’s registered address provided in Section 1 above and marked for the attention of “*Inspektor Ochrony Danych*”. The contact details of the Data Protection Officer are also available in the Contacts section of the www.orlen.pl website.
3. Your personal data has been transferred to ORLEN S.A. by ANWIL S.A., an ORLEN Group company (the “**ORLEN Group Company**”), in connection with certain Trade Credit Management processes, which are centralised and harmonised within the ORLEN Group. The data is your personal data relating to you as a Contractor (as defined in Section 4 below) or a representative of a Contractor, as appropriate. For the detailed scope of personal data processed by ORLEN S.A., see Annex 1 to this Privacy Notice.
4. The Contractor referred to in Section 3 above shall mean a person with whom the ORLEN Group Company maintains, or intends to enter into, Business Relations and, where the Contractor is a partnership, including a partnership under civil law, a partner in the Contractor. Where the context or legal relationship so requires, the Contractor may also mean a natural person, legal entity, or unincorporated organisation having legal capacity under statute which has created or provided any form of security interest for the benefit of the ORLEN Group Company, including a surety, issuer or guarantor of a promissory note, pledgor or any other debtor whose debt can only be enforced against collateral. Business Relations shall mean any economic relationship between the ORLEN Group Company and the Contractor where either party is obliged to pay consideration to the other party and such obligation does not arise from a corporate relationship.
5. ORLEN S.A. may process your personal data for any of the following purposes:
 - a) to enable the achievement of the objectives of the Trade Credit Centralisation within the ORLEN Group, including through harmonisation, as effectively as possible, of Trade Credit policies, rules, solutions, and processes within the ORLEN Group, as well as to ensure the achievement, to the fullest extent possible, of the objectives of the Trade Credit Management process,

including, without limitation, (i) a reduction in the amount of past-due receivables and their adverse impact on the financial performance of both the ORLEN Group Company and the entire ORLEN Group as part of a broader process to consolidate financial results and risks within the ORLEN Group Company in accordance with the applicable financial statement consolidation policies; and

- b) to enable ORLEN S.A. to properly perform its tasks and responsibilities related to the Trade Credit Centralisation, including with respect to cooperation with the ORLEN Group Company on managing Trade Credit and related risks.
- 6. The lawful basis for the processing of your personal data for the purposes specified in Section 5 above is the pursuit by ORLEN S.A. of its legitimate interests (Article 6.1(f) of GDPR) consisting in the pursuit of the objectives specified in Section 5 above, including internal reporting objectives of the ORLEN Group, enhancing the credibility and protecting the reputation of ORLEN and the ORLEN Group, and delivery of their economic objectives through limiting the consolidated risks of the ORLEN Group.
 - 7. Your personal data may be disclosed by ORLEN S.A. to its service providers (data recipients), including, without limitation, providers of ICT, mail and parcel delivery, advisory, legal, and data archiving services, as well as to subsidiaries of ORLEN S.A. other than the ORLEN Group Company that are participants in the Trade Credit Centralisation in order. and to such extent as may be necessary, to enable the achievement of the objectives of such centralisation, including, without limitation, to minimise the consolidated financial and legal risks of the ORLEN Group.
 - 8. Your personal data will be processed for a period necessary to pursue legitimate interests of ORLEN S.A. and to comply with obligations imposed by applicable laws. The data processing period may only be extended if and to the extent required by law.
 - 9. You have the following rights related to the processing of your personal data:
 - a) the right to access your data,
 - b) the right to have personal data rectified,
 - c) the right to have your personal data erased or to restrict its processing,
 - d) the right to object where ORLEN S.A. processes your personal data on grounds of its legitimate interests; an objection may be raised due to a specific situation.You can send your request concerning the exercise of those rights to the following email address: daneosobowe@orlen.pl or to ORLEN S.A.'s registered address provided in Section 1, marked for the attention of "Inspektor Ochrony Danych".
 - 10. You have the right to lodge a complaint with the President of the Personal Data Protection Office.

Annex 1 to the Privacy Notice For natural persons who are Contractors, or representatives of Contractors, of ORLEN Group Companies and whose details are shared across ORLEN as part of the Trade Credit Centralisation¹

TEMPLATE 1

This template is applicable to:

- (i) natural persons (including sole traders) who are Contractors, i.e. a party, or a prospective party, to a commercial contract with a ORLEN Group Company, including partners in Contractors which are partnerships under civil law;
- (ii) natural persons (including sole traders) who provide a security interest for the benefit of a ORLEN Group Company, including as promissory note issuers or guarantors, pledgors, sureties, providers of security deposits, mortgagors, or providers of any other form of security for an ORLEN Group Company.

Categories/scope of personal data shared with ORLEN S.A. by ANWIL S.A. as part of the Trade Credit Centralisation within the ORLEN Group.

- 1) full name
- 2) Polish National Identification Number (PESEL) (if any)
- 3) Tax Identification Number (NIP) (if any)
- 4) type and number of identity document (if any)
- 5) domicile, residential or mailing address (as applicable; if any)
- 6) email address or (landline or mobile) telephone number (as applicable)
- 7) marital status and type of community property regime (if applicable), docket/decision reference for court-ordered legal separation, divorce, etc.
- 8) if the person is a sole trader – also the name under which the person transacts business, the address or addresses where the person conducts business activities, his or her Industry Identification Number (REGON) and Tax Identification Number (NIP), and, where applicable, the name of the business register he or she is entered into, including the entry number
- 9) bank account number (if applicable)
- 10) trade credit limit
- 11) type and amount of security interest
- 12) details on the collaboration between the ORLEN Group Company and the Contractor, including sales, payment balance, payment history, order history, etc.
- 13) financial data disclosed in accounting (financial) documents in the form of: balance sheets, profit or loss accounts, F01 statements, income or expense certificates, or other documents confirming the financial position of the Contractor as at a given date (depending on the Contractor's legal form)

¹ Select the template which is applicable to a given category of natural persons.

TEMPLATE 2

This template is applicable to the spouse of:

- (i) a natural person (including a sole trader) who is a Contractor, i.e. a party to a commercial contract with a ORLEN Group Company, including a partner in a Contractor which is a partnership under civil law;
- (ii) a natural person (including a sole trader) who provides a security interest for the benefit of a ORLEN Group Company, including as a promissory note issuer or guarantor, pledgor, surety, provider of a security deposit, mortgagor, or provider of any other form of security for an ORLEN Group Company.

**Categories/scope of personal data shared with ORLEN S.A. by ANWIL S.A. as part of the
Trade Credit Centralisation within the ORLEN Group.**

- 1) full name
- 2) Polish National Identification Number (PESEL); (if any)
- 3) type and number of identity document (if any)
- 4) domicile, residential or mailing address (as applicable)
- 5) email address or (landline or mobile) telephone number (as applicable)
- 6) marital status and type of community property regime (if applicable), docket/decision reference for court-ordered legal separation, divorce, etc.

TEMPLATE 3

This template is applicable to a representative (e.g. attorney-in-fact, agent, partner in a partnership, Management Board member, commercial proxy, legal representative, etc.) of the Contractor or his or her spouse.

Categories of personal data shared with ORLEN S.A. by ANWIL S.A. as part of the Trade Credit Centralisation within the ORLEN Group.

- 1) full name
- 2) Polish National Identification Number (PESEL); (if any)
- 3) type and number of identity document (if any)
- 4) domicile, residential or mailing address (as applicable)
- 5) email address or (landline or mobile) telephone number (as applicable)
- 6) place of employment, function (if applicable)