



SSE S.A.  
[www.gsscert.com](http://www.gsscert.com)

# GDPR REGULATIONS GSS CERT SYSTEM

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## [DATA PROTECTION].

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### [Personal data protection] Legal grounds for data processing

1. GSS S.A. processes personal data in connection with the administration of the GSS CERT system, in accordance with the provisions 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 95/46/EC (General Data Protection Regulation) (Text with EEA relevance) - hereinafter referred to as GDPR.
2. GSS S.A. processes data in particular:
  1. Based on a person's consent to the processing of their personal data for one or more specified purposes, in accordance with Article 6(1)(a) of the GDPR
  2. in order to prepare, conclude and perform the Agreement with the Participant, in accordance with Article 6(1)(b) of the DPA;
  3. to perform SSE's legal obligations pursuant to Article 6(1)(c) of the GDPR;
  4. on the basis of the legally justified interest, in accordance with Article 6(1)(f) of the GDPR - for the duration of the conclusion and performance of the contract, the duration of the legal obligation, the existence of the legally justified interest and the statute of limitations for possible claims.

### [Data Protection] Data provided

1. Administrator indicates that using the GSS System requires processing of personal data, including data of persons acting on behalf or for the benefit of Participants and Users.
2. Therefore, the Administrator points out that the entities using the GSS CERT System are required to obtain the consent of the persons whose data they provide to the Administrator for the processing of their personal data and provide them with the information referred to in Article 14(1)-(4) of the GDPR.
3. The Administrator shall publish the data referred to in Articles 1 to 4 of the GDPR on the Website.
4. Participants and Users shall be responsible to the GSS for the accuracy and validity of any personal data they provide.

### [Data Protection] Information obligation

1. The Administrator processes personal data on the basis of a procedure developed in accordance with Article 25 of the GDPR.
2. The Administrator shall ensure all the necessary physical, technical and organizational measures for the protection of personal data against damage, loss, alteration, unauthorized

disclosure, use or access, taking into account the type and nature of the personal data processed, in accordance with the applicable laws.

3. In order to protect personal data, the requirements referred to in the GDPR have been met and:
  - a) data processing analysis was conducted,
  - b) a risk analysis was conducted on the resources involved in each process.
4. All persons acting for and on behalf of the Administrator are obliged to process personal data in accordance with applicable regulations (in particular the GDPR) and in accordance with internal procedure.
5. Employees and associates of the Administrator are required to:
  - a) processing and protection of personal data in accordance with applicable laws and internal procedure;
  - b) keeping personal information confidential and how to safeguard it;
  - c) reporting incidents related to data security breaches,
  - d) participate in periodic reviews of the personal data being processed,
  - e) participate in internal training organized by the Administrator.
6. The Administrator may conclude personal data processing entrustment agreements with third parties. Such agreements shall comply with the requirements set out in Article 28 of the GDPR.
7. With regard to the personal data processed, decisions will not be taken by automated means, in application of Article 22 GDPR.

#### [Data Protection] Personal data controller

The administrator of personal data in GSS CERT System is GREEN SAVINGS SCHEME Joint Stock Company with headquarters in Wielopole (postal code 33-210), Wielopole 62, registered in The National Court Register kept by The District Court for Cracow-Śródmieście in Cracow, XII Economic Department - National Court Register under KRS number 875742, with initial capital in amount of 100.000,00 PLN paid in full, NIP 8711777626, REGON 387799368.

#### [Data Protection] Contact Information

In matters concerning the processing of personal data, please write to us at the registered address of the company's headquarters or to the data protection officer's e-mail address: [gdpr@gsscrt.com](mailto:gdpr@gsscrt.com)

#### [Personal data protection] Source of data processed

The sources of personal data processed by the Administrator are, in particular:

1. Data provided pursuant to applicable consents, directly provided to the Administrator,
2. Data provided in connection with entering into a contractual relationship with the Administrator,
3. Data provided to the Administrator by third parties, pursuant to Article 14 of the GDPR,
4. Data submitted via the Website and emails to the Administrator.

## [Data Protection] Purpose of the data processed

Personal data are processed by the Administrator specifically for the following purposes:

- a) in order to conclude and perform contracts - in particular with Participants, Users, employees, partners, contractors and associates (Article 6(1)(a) and (b) GDPR),
- b) on the basis of separate and explicit consents given to the Administrator (Article 6(1)(a) of the GDPR),
- c) for contact purposes, including providing information,
- d) in order to assert claims or defend your own rights - that is, in order to pursue a legitimate interest (Article 6(1)(f) of the GDPR),
- e) in cases resulting from national and EU laws, when data processing is necessary for the fulfilment of a legal obligation incumbent on the Administrator,
- f) to conduct procedures related to the trading and redemption of SSE Units,
- g) for the purpose of conducting due diligence - to the extent specified in the GSS System Rules,
- h) to ensure the operation of GSS IT,
- i) for audits and verifications, including the performance of audit activities, including by external parties.

## [Data Protection] Period of data processing

1. We process the data for the duration of our legal obligations under Article 6(1)(a), (b), (c) and (f) of the GDPR for the duration of these obligations and no longer than the statute of limitations for possible claims.
2. If it is determined that the personal data collected has become outdated or inaccurate, persons acting for and on behalf of the Administrator shall promptly take action to update the dataset.
3. The duration of data storage is limited to the period of its usefulness for the purposes for which it was collected, after which time it is either anonymized or deleted.

## [Personal data protection] Types of data processed

In order to administer the GSS System, identification and contact data shall be processed, which may include: name and surname, position and place of work, address of residence, registered address, telephone number, PESEL number, NIP, REGON, e-mail address, designations identifying the Participant or User in the GSS IT System, i.e. login, IP address, designations identifying the telecommunication network endpoint or IT system used by the Participant or User or a person authorised by them. The information about the beginning, end and scope of each use of services provided electronically, information about the use of services provided electronically by the Participant or a person authorized by the Participant and any other personal data provided by the Participant.

## [Personal data protection] Recipients of the data processed

Privacy is very important to us, so the information you provide to us will not be shared with other parties, except:

- Entities whose transfer of personal data is necessary for the performance of a contract entered into with you, or with the company for which you work, including, in particular, certification bodies, entities that perform audits to verify compliance with the requirements of the system and disclosure of emissions, these entities may prepare publicly available audit reports within the scope of their activities.
- Other Participants and Users of the GSS IT System, to the extent that it results from the function performed by GSS.
- Entities to whom we outsource personal data processing services (processors), this will include, for example, our contractors and associates, entities that provide and administer IT systems, entities that maintain accessible databases about companies;
- Other data recipients - e.g. banks, tax advisors, law firms, postal or courier companies, etc., or other such entities whose data we provide in connection with the performance of obligations binding for the Administrator;
- Authorized state agencies.

The transfer of your data will take place in accordance with the principles set out in the GDPR, to the extent of the consents given, without prejudice to the applicable regulations for ensuring the required level of security and confidentiality.

## [Data Protection] EEA

Your personal data is not transferred to recipients in third countries, i.e. outside the European Economic Area (EEA). If you enter into a transaction with a counterparty outside the EEA, it may be necessary to transfer your personal data outside the EEA. As a rule, the transfer of data outside the EEA will be based on standard contractual clauses, the content of which has been approved by the European Commission.

## [Data Protection] Entitlements

- The right to request access to your personal information from us and the right to rectification, erasure ("right to be forgotten").
- The right to object to the processing of your personal data for direct marketing purposes, which causes us to stop processing your data for direct marketing purposes.
- The right to object on grounds relating to your particular situation where we process your personal data on the basis of a legitimate interest. However, we will continue to process your personal data to the extent necessary if there is a legitimate reason on our side to do so.
- The right to portability of data processed in connection with the performance of a contract or on the basis of your consent and the right to restrict processing.
- If the basis for the processing of your personal data is your consent, you have the right to withdraw this consent at any time. We would like to remind you that withdrawal of consent

does not, however, affect the lawfulness of our processing of your personal data that we performed on the basis of consent before its withdrawal.

Please note: we point out that under Articles 17, 20, 21 of the GDPR, some of the rights indicated above are subject to limitations due to the type of personal data, the purpose of their processing and the basis for consent to their processing.

### [Data Protection] Complaints

If you believe that our processing of your personal data violates the law, you may file a complaint with the President of the Office for Personal Data Protection.