

****Privacy Policy****

1. **Information about this Privacy Policy**

In this Privacy Policy, personal data means any information processed by Asterias, based on which you can be directly or indirectly identified ("Personal Data").

This Privacy Policy applies to Personal Data collected and processed by us and/or on our behalf by our external service providers during your cooperation with us.

Asterias is a member of the Smurfit Kappa Group with locations worldwide. The full list of entities belonging to the Group is available here. As part of our global operations, wherever possible, we strive to adopt a consistent approach to processing Personal Data. Depending on the region in which you reside, Group entities have established procedures to ensure the protection of your Personal Data.

2. **Types of Personal Data we process**

Asterias, as the data controller, processes Personal Data of:

- Business and marketing contacts
- Website users
- Social media users
- Current clients
- Potential clients
- Current non-client counterparties
- Potential non-client counterparties
- Authorized representatives

3. **Categories of collected Personal Data**

Depending on the nature of our cooperation, we may process the following Personal Data:

- If you are a business/marketing contact, including designated contract performers: your name, your employer's/company's name, job title, contact details, business activities, areas of interest, image (in case of participation in Asterias events), and information regarding your subscription, receipt, or interest in any of our mailing lists or newsletters.

- If you use our website: information about your visits to our website, IP address, operating system, browser used to access our website, internet service provider, date, and time of connection to the website, and if you use the "Contact us" form, additional data provided by you in this form and data regarding marketing consents.

- If there is interaction between you and our social media accounts: your name, location, country, job title, workplace, areas of interest, to the extent such types of Personal Data are visible on your social media accounts, other data disclosed in the user profile, data transmitted in comments, and messages.

- If you are a current client: your name, company name, contact details, billing information, details of your visits, correspondence, and other communications with our staff, image (in case of participation in Asterias events), and any other information provided by you or on your behalf.

- If you are a potential client: your name, company name, contact details, details of your visits, correspondence, and other communications with our staff, image (in case of participation in Asterias events), and any other information provided by you or on your behalf.

- If you are a current non-client counterparty: your name, company name, contact details, billing information, details of your visits, correspondence, and other communications with our staff, and any other information provided by you or on your behalf.

- If you are a potential non-client counterparty: your name, company name, contact details, details of your visits, correspondence, and other communications with our staff, and any other information provided by you or on your behalf.

- If you are an authorized representative: your name, the name of the entity you represent, position, details of your visits, correspondence, and other communications with our staff, and any other information provided by you or on your behalf or obtained from publicly available registers, to the extent disclosed in the registers.

4. **Purposes of processing Personal Data**

****BUSINESS AND MARKETING CONTACTS****

If you are a business/marketing contact, including designated contract performers, we may process your Personal Data for the following purposes:

- To promote Asterias' business activities.
- To invite you to events.
- To establish, develop, and maintain relationships with you.
- To manage and administer our relationships with business/marketing contacts representing current/potential clients/non-client counterparties.
- To contact you regarding contract performance.
- To send you marketing materials, newsletters, and other information.
- To monitor and analyze your interest in materials we send you.
- To send you marketing information via traditional mail.
- To conduct customer satisfaction surveys and other types of surveys.
- To document Asterias events through photography or filming.

Regarding the above circumstances, we typically rely on your consent to process your Personal Data and, in the case of sending you marketing materials electronically or by phone, separately obtained consents for such actions. In certain circumstances (e.g., when we maintain a business relationship with you and send our marketing materials via traditional mail), we will rely on our legitimate interests. We will also use the legitimate interest basis to establish, develop, and maintain business relationships with you in connection with our business activities and to document Asterias events.

You will always have the option to opt out of receiving marketing information (withdraw previously given consent or object to further processing of your data for marketing purposes).

****WEBSITE USERS****

If you visit our website, we may process your Personal Data for the following purposes:

- To maintain, enhance, test, and monitor the effectiveness of the website.
- To monitor data such as the number of visitors, traffic data, and correctness of demographic data.
- To ensure that website content is presented in the most effective manner to improve user experience.
- To notify you of any changes to our website and/or services.
- To correspond/respond to inquiries submitted through the "[Kontakt - Drukarnia Asterias Sp. z o.o.](#)" form.
- To send you marketing materials, newsletters, and other information.

We process such personal information based on our legitimate interest, which involves ensuring the smooth functioning of the website and analyzing which content presented on the site is most interesting to visitors. This allows us to continuously provide the website and improve it to better meet the needs of visitors. We also use the legitimate interest basis to, according to your expectations, respond to your inquiries/conduct correspondence with you regarding the inquiry submitted through the "Contact us" form. Sending you marketing materials, newsletters, and other information will be based on consents provided by you.

****Meta Pixel****

In order to display ads to relevant audiences, increase sales, and measure ad performance, we use the Meta Pixel on certain pages.

By operating the Meta Pixel mechanism, the operator of the Meta Platforms Ireland Limited platform (hereinafter referred to as Meta) shares joint responsibility with Asterias under Article 26 of the GDPR. Asterias has adopted the provisions of the Controller Addendum with Meta, available at https://www.facebook.com/legal/controller_addendum, to define the appropriate scope of obligations regarding compliance with GDPR obligations in relation to Joint Data Processing. By accessing the link above, you can also review the agreement between Meta and Asterias as the operator of the site. This attachment should be considered as an agreement under Article 26 of the GDPR between Meta and Asterias as a service provider using the Meta Pixel, sharing joint responsibility.

Asterias has agreed with Meta to be responsible for providing you with this information and that Meta is responsible for enforcing the rights of individuals whose data is processed, in accordance with Articles 15-20 of the GDPR regarding personal data stored by Meta after joint processing. Our use of Meta Pixel data and the purposes for which personal data is collected and transmitted as part of joint data processing comply with the terms of the Business Tools Terms available at <https://www.facebook.com/legal/terms/businessstools/>. More information on how Meta processes Personal Data, the legal basis, and methods of enforcing the rights of data subjects against Meta, as well as information required by Article 13(1)(a) and (b) of the GDPR regarding data processing by Meta, can be found in the Meta Data Policy at <https://www.facebook.com/about/privacy>.

Please contact Meta directly if you have any questions about your rights to information, rectification, deletion, data portability, and the right to object. If we receive such requests, we will forward them accordingly. In this context, we would like to point out that despite sharing joint responsibility under Article 26 of the GDPR, as a provider of services using the Meta Pixel, we do not control the collection and processing of statistical data. Meta bears sole responsibility for such actions.

Due to Meta services, data may be transferred outside the European Economic Area (EEA). Data transfers outside the EEA have been secured with European Commission-approved standard contractual clauses. Additional information is available at <https://www.facebook.com/help/566994660333381>.

The Meta Pixel mechanism uses cookies and similar technologies. Additional information is available in the Cookie Policy.

****Google (Ads Customer Match, Google Analytics, Google Tag Manager, Google Optimize)****

The website utilizes Ads Customer Match, Google Analytics, Google Tag Manager, and Google Optimize services created and provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter referred to as Google).

Google uses information collected by these services to assess user usage of our Services and provide information about traffic on our Services' pages. More information can be found at <https://policies.google.com/terms> and <https://policies.google.com/>.

We use these services to analyze data collected through Google advertising features, solely for statistical purposes. Users have the option to disable these settings using the Ad Preferences Manager available at <https://adssettings.google.pl/>.

We also use the data to advertise the website in Google search results and on other third-party websites.

Additional information about the terms of cooperation between Google and Asterias regarding the above services is available at <https://privacy.google.com/businesses/processorterms/>.

These services use cookies and similar technologies in accordance with the information in the Cookie Policy. As part of this technical process, Google obtains knowledge of personal data, such as the user's IP address of the Service, which is used by Google, among other things, to track the origin of visitors and clicks, which then allows for the preparation of applied sets.

Cookies and similar technologies are used to store personal data, such as the time of access, the location from which access was obtained, and the frequency of visits by the user of the Service to a particular website. Each time a user visits our website, this personal data, including the IP address of the internet connection used by the individual, is transmitted to Google in the USA. Google may disclose this data to third parties.

The Service user can prevent the collection of data generated by the above services. To do this, they must download and install the browser add-on from the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google systems via JavaScript technology that no data and information about visits to websites should be transmitted to Google Analytics services. The installation of the browser add-on is considered by Google to be an objection to data collection.

Google LLC processes personal data in the United States. Data transfer outside the European Economic Area (EEA) has been secured with European Commission-approved standard contractual clauses. Additional information is available at <https://policies.google.com/privacy/frameworks>.

SOCIAL MEDIA USERS

If you visit our social media accounts, we may process your Personal Data for the following purposes:

- To recognize demographic data and understand the preferences and interests of individuals visiting our social media accounts to provide them with better-suited content and information (profiling).
- To optimize our social media accounts and direct content to the appropriate audience.
- For other purposes arising from the content of submitted comments or messages, particularly to provide explanations and answers to questions.
- For the purpose of establishing, investigating, or defending against claims.
- For marketing purposes, especially for advertising additional services offered by Asterias, informing about contests, and events.

We process such personal information based on our legitimate interests.

Information on data processing in connection with running a fan page on Facebook and communication via Messenger

- Asterias is the data controller for data processed in connection with running the Fanpage on Facebook.
- When running a Fanpage on Facebook, Asterias uses data provided by Meta Platforms Ireland Limited (hereinafter referred to as Meta) such as total page views, user actions on the page, actions related to posts, video views, post reach, comments, shares, responses, geographic areas such as city and country, language, number of likes. Meta collects and provides this data to the Company.
- Meta Platforms Ireland Limited shares joint responsibility with Asterias under Article 26 of the GDPR. Due to the collection of statistical data by Meta, Meta has committed to taking responsibility for the ability to collect statistical data in accordance with data protection regulations. The same applies to ensuring the security of this data. More information on this topic, as well as information on how to exercise the rights of individuals whose data is processed, can be found on the Meta website, and relevant information on statistical data under the [link: \[Meta Legal Terms\]\(https://www.facebook.com/legal/terms/page_controller_addendum\)](https://www.facebook.com/legal/terms/page_controller_addendum).
- The above link also provides access to the content of the agreement between Meta and Asterias. According to this agreement, in case of any questions regarding the right to information, correction, deletion, transmission of data, and the right to object, please contact Meta directly. If we receive such requests, we will pass them on.
- Despite the joint responsibility under Article 26 of the GDPR, the administering Fanpage Asterias has no influence on the collection and processing of statistical data. Meta Platforms Ireland Limited bears exclusive responsibility for such actions.
- Regardless of the joint processing of data for statistical purposes, Meta is the data controller for data processed for its own purposes.
- Data processed on Facebook will be shared with:
 - Meta Platforms Ireland Limited,
 - persons using the Fanpage,
 - entities authorized to receive them under the law.
- Data processed on Facebook will be processed for the duration of the Fanpage operation.
- Data processed on Facebook will be transferred outside the European Economic Area in accordance with the information available on the [\[Facebook Help Center\]\(https://www.facebook.com/help/566994660333381/?helpref=uf_share\)](https://www.facebook.com/help/566994660333381/?helpref=uf_share).

Information on data processing in connection with running a page on LinkedIn

- Asterias is the data controller for data processed in connection with running a page on LinkedIn.
- When running a page on LinkedIn, Asterias uses data provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter referred to as "LinkedIn"). LinkedIn processes information regarding interactions with the Page (e.g., whether the page is viewed or visited). Additionally, LinkedIn processes data placed by the User of the LinkedIn page in their profile, such as job duties, country, industry, hierarchy level, company size, and employment status data. This data is aggregated and provided to organizations as statistical information to help them better understand trends and demographic data regarding individuals interacting with the Page on LinkedIn. Aggregated statistical information provided by Asterias does not allow for user identification. For example, statistical information will inform the organization that users from a specific country or working in a specific industry are interested in the Page on LinkedIn, but Asterias will not be able to identify the identities of these users. Regardless of statistical information and in accordance with settings, other users may be aware of public posts or social actions (e.g., liking or following) taken by the user on the Pages on LinkedIn.
- LinkedIn shares joint responsibility with Asterias under Article 26 of the GDPR. More information on this topic, as well as information on how to exercise the rights of individuals whose data is processed, can be found on the [\[LinkedIn website\]\(https://www.linkedin.com/help/linkedin/answer/124838/joint-controllership?lang=pl\)](https://www.linkedin.com/help/linkedin/answer/124838/joint-controllership?lang=pl).

Information on the possibility of exercising the rights available to page users is available at [this address](<https://www.linkedin.com/help/linkedin/answer/116277?lang=pl>). The content of the agreement is available at [this address](<https://legal.linkedin.com/pages-joint-controller-addendum>).

- Regardless of joint data processing for statistical purposes, LinkedIn is the data controller for data processed for its own purposes.

Google Business Profile

We use the Google Business Profile service, allowing for adding reviews about Asterias.

The data controller for data processed under this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, according to the information available at [Google Privacy Policy](<https://policies.google.com/privacy>).

EXISTING CUSTOMERS

If you are one of our existing customers, we may process your Personal Data for the following purposes:

- To conduct administrative, financial, and operational processes;
- To review and respond to correspondence and inquiries directed to us;
- To monitor sales levels and observe sales regularities;
- To conduct due diligence checks;
- To fulfill orders and ensure compliance with our obligations arising from any sales agreements concluded with you;
- To process financial payments and manage your customer account;
- To conclude and execute agreements;
- To investigate or defend against claims;
- For marketing purposes.
- To ensure compliance with the applicable company law in Poland and the European Union;
- To conduct customer satisfaction surveys and other types of surveys;
- To document events organized by Asterias through photography or filming.

We process your Personal Data for the above-mentioned purposes based on the following legal grounds:

- our legitimate interest in ensuring the functioning of our business and maintaining our relationship with you;
- the necessity arising from the fact of concluding and executing an agreement with you;
- our legitimate interest in investigating or defending against claims;
- our legitimate interest in documenting events organized by us;
- the necessity arising from the fact that we process your Personal Data to ensure compliance with the legal obligation arising from the applicable law in Poland and the European Union;
- your consent to undertake marketing actions against you.

If you do not want to provide us with your Personal Data so that we can process it for the above purposes, we will not be able to provide services or sell our products to you.

POTENTIAL CUSTOMERS

If you are one of our potential customers, we may process your Personal Data for the following purposes:

- To develop and maintain a relationship with you;
- To manage and administer our relationships with potential customers;
- To prepare for entering into an agreement;

- To document events organized by Asterias through photography or filming;
- For marketing purposes.

We process your Personal Data for the above-mentioned purposes based on the following legal grounds:

- our legitimate interest in developing and maintaining a business relationship with you;
- our legitimate interest in documenting events organized by us;
- the necessity of taking actions before concluding an agreement at your request;
- your consent to undertake marketing actions against you.

CURRENT CONTRACTORS OTHER THAN CLIENTS

If you are one of our current contractors other than a client, we may process your Personal Data for the following purposes:

- To enter into and perform contracts,
- To conduct administrative, financial, and operational processes;
- To review and respond to correspondence and inquiries directed to us;
- To conduct due diligence checks;
- To process financial payments;
- To assert or defend against claims;
- To ensure compliance with applicable corporate law in Poland and the European Union.

We process your Personal Data for the above purposes based on the following legal bases:

- Our legitimate interest in ensuring the functioning of our business;
- The necessity arising from entering into and performing a contract with you;
- Our legitimate interest in asserting or defending against claims;
- The necessity arising from processing your Personal Data to ensure compliance with legal obligations under applicable law in Poland and the European Union.

If you choose not to provide us with your Personal Data so that we can process it for the above purposes, we will be unable to enter into agreements with you, and you will not be able to provide services to us.

POTENTIAL CONTRACTORS OTHER THAN CLIENTS

If you are one of our potential contractors other than clients, we may process your Personal Data for the following purposes:

- To develop and maintain a relationship with you;
- To manage and administer our relationships with potential contractors other than clients;
- To prepare for entering into a contract.

We process your Personal Data for the above purposes based on the following legal bases:

- Our legitimate interest in developing and maintaining a business relationship with you;
- The necessity of taking steps prior to entering into a contract at your request.

AUTHORIZED REPRESENTATIVES

If you are an authorized representative of our current/potential client/contractor other than a client, we may process your Personal Data for the following purposes:

- To verify authorized representatives;
- To assert or defend against claims.

We process your Personal Data for the above purposes based on the following legal bases:

- Our legitimate interest in the possibility of verifying the authority granted;
- Our legitimate interest in asserting or defending against claims.

Where required by applicable data protection laws, we will only use your Personal Data for the purposes for which we collect it, unless we determine that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in advance of the purpose and legal basis for further processing. If we rely on Asterias' legitimate interests or those of an external recipient of Personal Data for its use and disclosure, you have the right to object to such use or disclosure, and if you do so, we will cease processing your Personal Data for that purpose unless we can demonstrate compelling legitimate grounds for continuing to do so.

5. How we disclose your Personal Data

Depending on our relationship with you, we may disclose some or all of your Personal Data to service providers and other parties listed in this section.

Service Providers and Affiliated Entities

We will disclose Personal Data to our service providers and affiliated entities so that they can provide services to us. Our service providers assist us, for example, in providing website user support or marketing and PR services. We carefully select service providers and take appropriate measures to protect your Personal Data when engaging service providers.

Legal Obligations

Smurfit Kappa Group may disclose Personal Data when required by law or other regulations, court orders or administrative orders with legal force, or when required by authorities subject to the regulations of the Smurfit Kappa Group.

Business Transfers

Your Personal Data may be transferred to another entity and our legal advisors and others if there is or will be a merger, acquisition, bankruptcy, or other transaction (or proposed transaction) in which that entity will take control of our business or assets of our business (in whole or in part).

6. Transferring personal data

Due to the global nature of our business, your Personal Data may be transferred to Smurfit Kappa Group companies, subcontractors, and partners located in countries around the world. We will always take

steps to ensure that each case of international transfer of Personal Data is carefully managed to protect your rights and interests.

Some data transfers may take place outside the European Economic Area ("EEA") to countries that do not have equivalent safeguards, and in the case of such transfers, the Smurfit Kappa policy provides that (i) they do not take place without prior written authorization; and (b) appropriate data transfer mechanisms are implemented to protect Personal Data. We implement standard contractual clauses for the transfer of your Personal Data to our affiliated entities and suppliers outside the EEA. You have the right to request more information about the security measures we have implemented (including a copy of the data transfer mechanism mentioned above). Please contact us if you would like more information or to request a copy of the relevant safeguards (which may be redacted to ensure confidentiality).

7. Security and data retention

We strive to protect Personal Data from unauthorized access, use, and disclosure by employing appropriate physical, technical, and organizational security measures depending on the nature of the Personal Data and the way it is processed.

As for the Personal Data of business and marketing contacts, it is generally stored for the duration of maintaining our current relationships or withdrawing consent/objection. When we determine that the retention of such Personal Data by us is no longer necessary, it will be deleted.

As for the Personal Data of website users, it is stored for a period of 12 months from the last visit to the website.

As for the Personal Data of social media users, it is stored for a period of 12 months from the publication on social media.

As for the Personal Data of current clients, it is stored for the duration of the agreement, and then for a period determined by tax and accounting regulations. If Personal Data is processed based on your consent or our legitimate interest, we will retain it until the consent is withdrawn/objection is raised, but no longer than necessary to achieve the processing purposes.

As for the Personal Data of potential clients, it is stored for the duration of maintaining our relationships or until consent is withdrawn/objected.

As for the Personal Data of current contractors other than clients, it is stored for the duration of the agreement, and then for a period determined by tax and accounting regulations. If Personal Data is processed based on our legitimate interest, we will retain it until objection is raised, but no longer than necessary to achieve the processing purposes.

As for the Personal Data of potential contractors other than clients, it is stored for the duration of maintaining our relationships or until objection is raised.

As for the Personal Data of authorized representatives, it is stored for the duration of the agreement or until objection is raised.

It should be noted that in certain circumstances, we may retain your data for a longer period, for example, if we are pursuing or defending claims or if we have grounds to believe that we should retain your Personal Data in accordance with the law or the expectations of relevant authorities.

8. Your rights regarding personal data

According to applicable privacy laws, you have certain rights.

For more information on whether you can exercise any of the following rights in your jurisdiction, please contact us at: biuro@sterias.pl. In this section, we have specified some rights of data subjects arising from the GDPR, which apply to clients located in the EEA.

- i. Request access to your Personal Data. This allows you to receive a copy of the Personal Data we hold about you and to check whether we are processing it lawfully.
- ii. Request correction of your Personal Data. This allows you to correct any incomplete or inaccurate information we hold about you.
- iii. Request erasure of your Personal Data. This allows you to ask us to delete your Personal Data if there is no reason for us to continue processing it. You also have the right to request us to delete your Personal Data if you exercise your right to object to its processing (see below).
- iv. Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- v. Request the restriction of processing of your Personal Data. This allows you to ask us to suspend the processing of your Personal Data, for example, to establish its accuracy or the reason for processing it.
- vi. Request the transfer of your Personal Data to another party.
- vii. Withdraw consent at any time where we are relying on consent to process your Personal Data. If you withdraw your consent, it will not affect the lawfulness of any processing we carried out before you withdrew your consent.
- viii. Lodge a complaint with the relevant supervisory authority if you believe that the processing of your Personal Data breaches applicable law. Please contact us first so that we can respond to your complaint. Contact details are available here: https://edpb.europa.eu/about-edpb/about-edpb/members_en or please contact us using the contact details provided below (Asterias).

You can exercise the above rights by contacting us using the contact details provided below. Your rights are subject to limitations as defined in applicable data protection laws. Further information about these rights and the circumstances in which they may arise in connection with our processing of your Personal Data can be obtained by contacting our Data Protection Officer in writing at ul. Lwowska 184, 33-100 Tarnów.

9. Changes to this Privacy Notice

We continually seek to improve our services, so from time to time we may be required to make changes to this Privacy Notice to reflect changes in technology, law, business operations, or for any other reason we deem necessary or appropriate.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice or otherwise presented to you at the time of collection, we will notify you by email or by mail, and you will have the opportunity to choose whether we can use your Personal Data in the new way.

10. Contact Information

For any questions or concerns regarding this Privacy Notice, the ways in which we collect and use your Personal Data, or your choices and rights regarding such collection and use, please contact us at:

- i. Asterias Sp. z o.o.
- ii. Telephone: +48 14 626 95 75, 626 95 94
- iii. Email: biuro@asterias.pl
- iv. Address: ul. Lwowska 184, 33-100 Tarnów