

## **INFORMATION CLAUSE CONCERNING RECORDING OF TELEPHONE CALLS**

In connection with the introduction of security and service improvement measures at La Mania Sp. z o.o. in the form of recording incoming and outgoing calls in the telephone exchange system and the processing of personal data by this system, in accordance with Article 13(1) and (2) 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; hereinafter referred to as: the "GDPR"), La Mania Sp. z o.o. hereby informs that:

### **Data Controller**

1. The Controller of the personal data is "LA MANIA" SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (registered office and service address: ul. Czerniakowska 87a, 00-718 Warsaw), entered in the register of entrepreneurs of the National Court Register under the number: KRS 0000366284, maintained by the District Court for the capital city of Warsaw in Warsaw, 13th Commercial Department of the National Court Register, share capital in the amount of: PLN 29 172 150.00; Tax Identification Number - NIP: 1132813143, Statistical Identification Number - REGON: 142572166 (hereinafter referred to as: "LA MANIA");
2. Contact with the Controller is possible in writing - to the address: LA MANIA Sp. z o.o. ul. Czerniakowska 87a, 00-718 Warsaw or electronically - to the e-mail address e-lamania@lamania.eu or by phone at +48 885 250 250

### **Purpose and basis of personal data processing:**

1. We will process your personal data for the following purposes:
  - a) to ensure the highest standards of service and the proper conduct of conversations conducted with customers via the helpline system, recorded - based on your voluntary consent to the recording of the call by expressing a confirmatory action, i.e. the continuation of the telephone call to La Mania (under Article 6(1)(a) of the GDPR),
  - b) resulting from the legitimate interests of the Controller, such as, among others increasing security and improving the quality of customer service, limiting the possibility of admitting an infringement of the law in force or norms of social co-existence by persons making the calls as well as by persons receiving such calls, securing evidence (including identification of the offender) allowing to clarify whether the aforementioned infringement has taken place, ensuring protection of personal data of persons making the calls, as well as personal data of other persons referred to during the call, to enable objective assessment of the exercising of the rights vested in the persons making the calls, to handle a request made via the helpline regarding any issues other than those specified above, to establish, defend and assert claims and to create statements, analyses and statistics for the Controller's internal needs, to adjust the content of the Controller's services (e.g. helpline service) to your needs, to ensure the security of these services, as well as their continuous improvement, and to deal with enquiries and complaints regarding the Controller's products and services, direct marketing carried out in traditional form (e.g. by letter) (under Article 6(1)(f) of the GDPR),
  - c) should the processing of your personal data take place for a purpose other than those indicated above, this will take place, on a case by case basis, after obtaining your prior consent to process your personal data, to the extent and for the purpose indicated in that consent (under Article 6(1)(a) of the GDPR).

## **Categories of personal data recipients**

1. Your personal data may be disclosed to the following entities: employees and associates of the Controller, IT service providers, entities providing consultancy, legal services.
2. Your personal data may be made available to entities and authorities authorised to process such data pursuant to the legal regulations.
3. The Controller does not intend to transfer your personal data to countries outside the European Economic Area or to an international organisation.

## **Personal data retention period**

Your personal data will be processed

a) up to one year from the date of recording. Where recordings of a recorded telephone call constitute evidence in proceedings (e.g. court proceedings), the above-mentioned time limit shall be extended until such time as the court proceedings have become final or

b) until your consent is withdrawn and, after revocation, only for the purpose of safeguarding the Controller's legal interests in order to provide the grounds for establishing, asserting or defending claims.

## **Your Rights**

1. Your personal data will not be transferred to a third country/international organisation.
2. Your data will not be processed by automated means.
3. Consent to the recording of a telephone call is voluntary but is necessary in order to continue the telephone call. Consent to the recording of calls may be withdrawn at any time, but this shall not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal. The provision of personal data during the call is voluntary, but the refusal to provide such data may result in the impossibility of accepting and handling the call, however, it is a prerequisite of connecting the call. If personal data is not provided, the Controller will be forced to refuse the performance of the activities which are the subject of the call in progress.
4. You have the right to request from the Controller access to your personal data, rectification, erasure, restriction of processing of such data or data portability;
5. To the extent that the processing of your personal data is based on consent, you have the right to withdraw it. The withdrawal of the consent shall not affect the compliance with right of processing which was applied under the consent prior to its withdrawal.
6. To the extent that the processing of your personal data is based on the premise of the Controller's legitimate interest, you have the right to object to the processing of your personal data.
7. In order to exercise the above rights, please contact the Controller using the contact details indicated above (see section 2 for contact details indicated above).
8. Whenever you consider that processing of your personal data by the Controller violates the provisions of the GDPR, you also have the right to lodge a complaint with the President of the Office for Personal Data Protection.