

# Privacy Policy

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# I.

## How do we process your personal data?

On the basis 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 (referred to as «GDPR,» or «General Data Protection Regulation»), we would like to inform you about the processing of your personal data in connection with your use of our website..

### 1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND HOW CAN YOU CONTACT US?

Quad/Graphics Europe Sp. z o.o. with its registered office in Wyszaków, 07-200 Wyszaków, ul. Pułtуска 120, entered into the Register of Entrepreneurs of the National Court Register, kept by the District Court in Białystok, 12th Commercial Division of the National Court Register, with the number KRS number: 0000029585, REGON (National Business Register Number): 570775337, NIP (Tax Identification Number): 7642085674, with the share capital of PLN 160,857,000.00 (hereinafter: QGE) is the controller of your personal data in connection with your use of our website.

If you have any questions about the processing of your personal data and your rights, please contact our Data Protection Officer by email at daneosobowe@quad.eu or by post at: Quad/Graphics Europe Sp. z o.o., ul. Pułtуска 120, 07-200 Wyszaków with the inscription: "Dot. ochrony danych osobowych" ("Subject: Personal data protection").

### 2. WHAT PERSONAL DATA DO WE PROCESS, FOR WHAT PURPOSES, AND ON WHAT LEGAL BASIS?

- in order to allow you to contact us via the contact form, we process the personal data you provide in this form, i.e., forename, surname, company name, telephone number, e-mail address, country;  
**legal basis:** Your consent (Article 6(1)(a) GDPR);
- in order to allow you to create and use an account on the Career tab, and to administer this account, we process the User name you have provide and the password you set;  
**legal basis:** Your consent (Article 6(1)(a) GDPR);
- in order to allow you to apply for a QGE job offer via our website, we process the personal data you provide in your application;  
**legal basis:** Article 22<sup>1</sup> of the Labour Code which lists the personal data an employer may require from an applicant for employment; your consent (Article 6(1)(a) GDPR);
- we process the e-mail address you provide for the purpose of sending you the newsletter, i.e., for marketing our own products and services and those of our affiliates;  
**legal basis:** Your consent (Article 6(1)(a) GDPR);
- saving data in cookies  
**legal basis:** Voluntary consent (Article 6(1)(a) of the GDPR).
- for the purpose of marketing our own products and services and those of the Quad group  
**legal basis:** Your consent (Article 6(1)(a) GDPR); the legitimate interest of the data controller (Article 6(1)(f) GDPR);

the above personal data may also be processed by us for the purpose of:

- the performance of actions at your request prior to the conclusion of the contract, as well as the conclusion and performance thereof;
- fulfilling of a legal obligation incumbent on QGE, e.g. to issue an invoice or bill;
- compilation of statistical figures on the use of the various functionalities of our website and the guarantee of its IT security - we process personal data relating to your activity on our website, such as pages and subpages visited, the amount of time spent on each page, as well as data relating to your search history, your IP address, location, device ID, and data relating to your browser and operating system;
- defence against or pursuit of claims - we may process certain personal data provided by you, data relating to the use of our services, our website, other data necessary to prove the existence or inexistence of a claim, including the extent of any damage suffered;
- demonstration of our fulfilment of our obligations under GDPR;
- tax and accounting.

### 3. ARE YOU OBLIGED TO PROVIDE YOUR PERSONAL DATA?

Insofar as the processing of your data takes place for the purpose of using the contact form, the User account for receiving the newsletter or the QGE performing other actions at your request, the provision of your data is a condition for the achievement of these purposes. The provision of data is voluntary, but is necessary for us to carry out the above activities. Otherwise, the provision of personal data is voluntary, is not a statutory or contractual requirement, and is not a condition for the conclusion of the contract.

### 4. HOW TO WITHDRAW MY CONSENT?

You can give consent in all, some, or none respects.

You can withdraw any consent given to QGE in connection with the processing of your personal data at any time without any consequences. Simply use the option to withdraw consent on our website, or send an email to: [daneosobowe@quad.eu](mailto:daneosobowe@quad.eu) or a letter with your request by post to: **Quad/Graphics Europe Sp. z o.o., ul. Pułtуска 120, 07-200 Wyszaków with the inscription: "Dot. ochrony danych osobowych" ("Subject: Personal data protection")**. The intent to withdraw consent may be expressed in any way, the only condition being that it must reach us. The withdrawal of consent shall not affect the lawfulness of the processing of your data before withdrawal, i.e. until you withdraw your consent, the processing of your data by QGE is legal.

### 5. WHO CAN BE THE RECIPIENTS OF YOUR PERSONAL DATA?

We transfer your personal data to the following categories of recipients:

- entities within the Quad group

We share your personal data with our parent company, Quad Inc., and other Quad entities for the purpose of joint marketing campaigns.

- companies operating our website

We pass your personal data to the service providers we use to run our website. They process your personal data only on our instructions. They provide us with a cloud hosting service, provide us with systems for carrying out online sales and marketing, for sending emails, for analysing website traffic, for analysing the effectiveness of marketing campaigns, and for applying for jobs through our website.

Our suppliers are mainly based in Poland and other countries within the European Economic Area (EEA). Our parent company, Quad Inc., is based outside the EEA. In connection with the transfer of your data outside the EEA, we have ensured that the recipients of your personal data have given guarantees of a high level of personal data protection. These guarantees arise in particular from the application of binding corporate rules or standard contractual clauses adopted by the Commission (EU).

- state authorities

We make your personal data available if requested to do so by authorised state authorities, in particular organisational units of the public prosecutor's office, the Police, the President of the Personal Data Protection Office or the President of the Office of Electronic Communications.

## 6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will process your data processed on the basis of consent until you withdraw that consent.

Your personal data will be stored for as long as necessary for the performance of the contract and thereafter for a period of time corresponding to the limitation period for claims that QGE may raise and that may be raised against QGE. If your personal data will be processed in order for QGE to comply with a legal obligation incumbent on it as a controller, the personal data will be kept for the time necessary to comply with this obligation.

## 7. WHAT RIGHTS DO YOU HAVE IN RELATION WITH THE PROCESSING OF YOUR PERSONAL DATA?

We ensure your rights as listed below. You can exercise your rights by submitting a request to our Data Protection Officer by email: [daneosobowe@quad.eu](mailto:daneosobowe@quad.eu) or by post at: **Quad/Graphics Europe Sp. z o.o., ul. Pułtуска 120, 07-200 Wyszków with the inscription: "Dot. ochrony danych osobowych" ("Subject: Personal data protection")**.

### 1) RIGHT TO OBJECT TO THE USE OF PERSONAL DATA

You have the right to object at any time to the use of your personal data, including profiling, where we process your data on the basis of our legitimate interest, e.g. in connection with marketing our products and services and our customers, and keeping statistical figures on the use of particular functionalities of the website. If your objection proves to be reasonable and we do not have any other legal basis to process your personal data, we will erase the data which you objected to be processed.

**Legal basis:** Article 21 of the GDPR.

## **2) RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)**

You may request that all or a part of personal data be erased.

You have the right to demand erasure of your personal data if:

- you have withdrawn a specific consent, to the extent that personal data were processed on the basis of that consent;
- your personal data are no longer necessary for the purposes for which they were collected or processed;
- you have objected to the use of your data for marketing purposes;
- you have objected to the use of your data for the purpose of keeping statistics on the use of the website;
- your personal data are being processed unlawfully.

Despite the demand to erase personal data, due to an objection or withdrawal of consent, we may retain certain personal data to the extent required by applicable law, e.g., to the extent necessary to defend against or raise possible claims.

**Legal basis:** Article 17 of the GDPR.

## **3) RIGHT TO RESTRICTION OF PROCESSING**

You may request us to restrict the processing of your personal data. If you file such a request, until it is considered we will prevent you from using certain functionalities or services which can only be used with processing of the personal data covered by your request. In addition, we will not send you any messages, including marketing information.

You have the right to demand the restriction of the use of your personal data in the following cases:

- when you question the accuracy of your personal data;
- when the processing of your data is unlawful and instead of erasure, you demand the restriction of its use;
- when your personal data are no longer necessary for the purposes for which we collected or used it, but are needed by you in order to establish, assert or defend your claims;
- when you have objected to the use of your data, in which case the restriction shall apply for the period necessary to consider whether, on account of your particular situation, the protection of your interests, rights and freedoms outweighs the interests we are pursuing by processing your personal data.

**Legal basis:** Article 18 of the GDPR.

## **4) RIGHT OF ACCESS TO DATA**

You have the right to obtain from us confirmation as to whether we process your personal data, and if that is the case, you have the right to:

- access your personal data;
- obtain information on the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients of such data, the envisaged period for which your personal data will be stored or the criteria used to determine that period, the rights you have under the GDPR and the right to lodge a complaint with a supervisory authority, the source of such data, the automated decision-making, including profiling, and the security measures used in connection with transfer of such data to outside of the European Union;
- obtain a copy of your personal data.

**Legal basis:** Article 15 of the GDPR.

### **5) RIGHT TO RECTIFICATION**

You have the right to rectify (if inaccurate) and complete the personal data you have provided (if incomplete).

**Legal basis:** Article 16 of the GDPR.

### **6) RIGHT TO DATA PORTABILITY**

You have the right to receive your personal data provided to us and then to transmit those data to another data controller, selected by you, for example to another operator of similar services. You also have the right to demand that we send your personal data directly to such other controller, where technically feasible.

We will send your personal data in the form of a file in a commonly used, machine-readable format which allows the data received to be sent to another personal data controller.

**Legal basis:** Article 20 of the GDPR.

## **8. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?**

We make every effort to ensure the security of your personal data. We take the security of your data very seriously, which is why we use, among other things, encrypted data transfer (SSL) during registration and login to your User account. This ensures that your identifying details are protected and makes it significantly more difficult for unauthorised systems or individuals to intercept access to your account.

Your data is stored in cloud hosting under personal data processing agreements. Data back-up copies are made periodically and stored on server disks located in our company premises.

Only authorised employees who have been granted access rights have access to your data in our company. Other employees do not have access to your data.

## **9. WHERE CAN YOU LODGE A COMPLAINT AGAINST THE PROCESSING OF YOUR PERSONAL DATA BY QGE?**

You may lodge a complaint with a supervisory authority. Currently, such complaints can be addressed to the Inspector-General for Personal Data Protection. However, we would like to point out that the President of the Personal Data Protection Office may soon be the competent supervisory authority in this matter.

## **10. HOW TO CONTACT OUR DATA PROTECTION OFFICER?**

This can be done by email at: daneosobowe@quadgraphics.pl or by post at: Quad/Graphics Europe Sp. z o.o., ul. Pułtуска 120, 07-200 Wyszaków with the inscription: "Dot. ochrony danych osobowych" ("Subject: Personal data protection").

## II.

# Website operations and cookies

1. Cookies are text files that are stored by a website in your browser.
2. The data controller processes the collected data needed for visit statistics, which may include: time spent viewing the site, details whether the visitor has been to the site before, information about the device from which the visitor is connecting, location based on the IP address sent.
3. The website automatically collects only the information contained in cookies.
4. The user may withdraw their consent at any time by changing the settings of their browser regarding the allowed use of cookies.