

## INFORMATION CLAUSE FOR APPRENTICE/TRAINEE

(valid from 01 June 2025, version 3.0)

Pursuant to Article 13(1) and (2) as well as Article 14(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 (the so-called General Data Protection Regulation) ("**GDPR**"), we inform you that that:

### DATA CONTROLLER

The controller of your personal data is (contact details): **Łukasiewicz Research Network – PORT Polish Center for Technology Development with its registered office in Wrocław**, 147 Stabłowicka Street, 54-066 Wrocław, KRS: 0000850580; NIP: 8943140523; [biuro@port.lukasiewicz.gov.pl](mailto:biuro@port.lukasiewicz.gov.pl) (hereinafter referred to as the "**Controller**").

### PERSONAL DATA INSPECTOR

The Controller has appointed a Data Protection Officer ("**DPO**"). Contact with the DPO: [iod@port.lukasiewicz.gov.pl](mailto:iod@port.lukasiewicz.gov.pl) or in writing to the Controller's address indicated above. We invite you to contact us in all matters related to the processing of your data.

### PURPOSE OF PROCESSING AND LEGAL BASIS

The purpose of the processing of your personal data is:

1. performance of an internship contract, graduate internship, compulsory or non-compulsory, internship contract (paid or unpaid), pursuant to Article 6(1)(b) of the GDPR,
2. conducting internships in accordance with the Act on Graduate Internships and the fulfillment of legal obligations, including tax obligations, in the case of a paid contract, as well as the Law on Higher Education in the case of compulsory internships, as well as in the field of Occupational Medicine, and internship contracts, pursuant to Article 6(1)(c) of the GDPR or Article 6(1)(e) of the GDPR as part of the implementation of mandatory internships,
3. implementation of the legitimate interest of the Controller, which is to ensure safety, protection of property, confidentiality of information concerning the Controller, video monitoring (full content of the information clause in the field of monitoring) available on the premises of the Controller, pursuant to Article 6(1)(f) of the GDPR,
4. implementation of the legitimate interest of the Controller, which is the processing of the image by placing it in e-mail or Teams or Intranet or internal communicators of the Controller, provided that you receive access to such IT systems of the Controller, pursuant to Article 6(1)(f) of the GDPR,
5. necessity for the purposes resulting from the legitimate interests pursued by the Controller, consisting in the establishment, pursuit or defense of claims, pursuant to Article 6(1)(f) of the GDPR.

### RETENTION PERIOD

Your personal data may be processed until the statute of limitations for any claims or settlement of the pursued claims (alternatively: settlement of the received co-financing or will be processed for a period not longer than 5 years from the end of the calendar year for tax purposes, if the agreement was payable, depending on which of these periods is longer). Notwithstanding the above, your personal data may be processed for archival purposes for the period specified in the Controller's internal documentation in connection with the Act on National Archival Resources and Archives.

### DATA SOURCE AND CATEGORIES

We process your data provided to Us directly or by the university or school or for the purposes indicated above. If the data has not been provided to us directly, as a rule, they concern such categories of data as: name, surname, e-mail, telephone number, qualifications, album number and other data necessary to conclude an internship agreement and issue a certificate of

completion of the internship.

### **DATA RECIPIENTS**

Subject to all data security guarantees, we may transfer your data to other entities, including entities authorized to receive them on the basis of applicable law, entities processing them on our behalf (e.g. providers of technical or IT services, entities providing hosting services, providers of analytical services, entities providing us with consulting services, property protection) and other administrators (e.g. notary offices or occupational medicine or occupational health and safety (OSH)) Your personal data may also potentially be disclosed in the mode of access to public information at the request of any interested party.

### **TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA**

Your personal data will generally not be transferred to third countries or international organizations. If necessary for the purposes set out above, we may transfer your personal data to our recognised subcontractors or contractors in countries outside the EEA. Bearing in mind that the level of personal data protection in these countries may differ from that provided by the GDPR in the European Union, the transfer of data is carried out with an adequate level of protection, primarily through verification of the EC's decision.

We use Microsoft 365. Personal data may be transferred to a third country (USA) on the basis of the decision of the European Commission of 10 July 2023, stating the adequacy level of protection provided by the "EU-US Data Privacy Framework", in connection with the Controller's use of solutions provided by Microsoft. A list of entities that have signed up to the EU-US Data Protection Framework is available at: Participant Search ([dataprivacyframework.gov](https://dataprivacyframework.gov)).

Unless otherwise decided by the European Commission: personal data may be transferred on the basis of standard contractual clauses used in contracts with such companies, or binding corporate rules approved by the competent supervisory authority, or on the basis of the conditions set out in Article 49 of the GDPR.

### **PROFILING**

With regard to your personal data, decisions will not be made by automated means. There will also be no profiling based on them.

### **DATA REQUIREMENT**

Providing Personal Data is voluntary, but necessary for the conclusion and performance of the contract concluded with the Controller, as well as the implementation of internships or internships with the Controller.

### **RIGHTS AND RIGHTS**

To exercise your rights, please contact the Controller by e-mail at the above-mentioned contact details of the Data Protection Officer. You have the right to:

1. access to the personal data provided;
2. as a rule - rectify or supplement the personal data provided;
3. as a rule - request restriction of the processing of personal data in the situations specified in Article 18 of the GDPR;
4. lodge a complaint with the President of the Office for Personal Data Protection against the processing of data by the Controller;
5. as a rule - to delete data (the right to be forgotten). However, we would like to inform you that you do not have the right to delete data (the right to be forgotten), to the extent determined by Article 17(3)(b), (d) or (e) of the GDPR, as long as the basis for the processing of your data is Article 6(1)(c) of the GDPR (it is limited due to the fact that it is processing for purposes resulting from the provisions of law – the Ordering Party must process this data in accordance with the law) or Article 6(1)(e) of the GDPR (up to the establishment, exercise or defence of claims);
6. as a rule - the transfer of personal data, where the basis for processing is Article 6(1)(b) GDPR

### **Page 2 with 3**

- or on the basis of consent. However, we inform you that: this right does not apply to processing that is necessary for the performance of a task carried out in the public interest and is restricted in this procedure (Article 20(3) of the GDPR);
7. object to the processing of personal data for direct marketing purposes and purposes based on Article 6(1)(f) GDPR; If you object to processing for direct marketing purposes, your personal data must no longer be processed for such purposes;
  8. withdraw their voluntary consent to the processing at any time – if the processing is based on consent. The withdrawal of this consent does not affect the previous processing on this basis, before its withdrawal.

We would like to point out that the legal provisions related to the implementation of projects (financing from European or other funds), in particular the project guidelines, may result in further restrictions on your rights in specific cases. In case of any doubts, please contact the Controller's Data Protection Officer.

**Notwithstanding the above, I would like to inform you that your personal data may be processed under the concluded Agreement on joint control of personal data in the Łukasiewicz Research Network – if you have been granted rights in the Controller's IT systems regarding the Microsoft 365 package, and I would like to inform you about the principles of data processing under this agreement.**

**The agreement on joint control concerns the creation of an IT tool for contact within the Łukasiewicz Network (in particular the Microsoft 365 package, Teams and other IT systems),** hence I inform you as follows:

1. On 1 April 2020, the Controller concluded an agreement on joint control of personal data in the Łukasiewicz Research Network (Act of 21 February 2019 on the Łukasiewicz Research Network). It aims to create an IT tool providing access to a common internal e-mail and a common address book, integrated with Active Directory services, enabling contact between employees and associates of the Łukasiewicz Network and containing data of persons employed by entities operating within the Łukasiewicz Research Network, as well as data of other third parties to the extent necessary for the performance of the Network's statutory tasks Łukasiewicz Research Centre and its constituent entities. Data processing takes place in IT systems.
2. The basis for the processing of your personal data in this regard is the legitimate interest of the Controller, and the relevant provisions of law, the exercise of public authority entrusted to the Controller or your consent (Article 6(1)(a), (c), (e) and (f) of the GDPR).
3. Scope of personal data processed as part of joint control of personal data: name and surname, name of the employing institute, e-mail addresses, landline and/or mobile phone numbers, supervisor, position, organizational unit - Department, address of the employee's business location, province, country, city, street, office, postal code, IT related to the IT equipment used, information on the user's activity in the IT system, information published and transmitted in the IT system. The data subject (system user) will also be able to independently and voluntarily decide whether to include in the tool his/her personal data other than the data indicated above, such as: photograph, profile and professional experience.
4. The data subject may request each of the joint controllers to exercise their rights under applicable law, in particular those indicated in point 10 above (Instruction on the rights of the data subject).
5. The joint controller agreement was concluded on the basis of Article 27 of the GDPR. It allows individual Personal Data Controllers to conclude processing entrustment agreements. The Joint Controllers are responsible for the actions of the entities with which they conclude processing agreements as for their own actions.
6. The period for which personal data will be stored, and if this is not possible, the criteria for determining this period: for the period necessary to achieve the purpose of processing, not shorter than the period indicated in the archiving regulations, i.e. the Act of 14 July 1983 on the national archival resource and archives and internal files in force in the organizational units of the Łukasiewicz Research Network in the field of creating and storing documentation. If the data is processed on the basis of your consent, it will be processed until it is withdrawn and until the claims expire.
7. Information on the recipients of personal data or on the categories of recipients: law enforcement and control authorities.
8. More information in the above scope can be found at the link after obtaining authorizations to the IT systems of the <https://lukasiewiczgov.sharepoint.com/sites/RODO> Controller. The above link also includes "The main content of the arrangements between the joint controllers".