

Data Protection Information

Data Protection Information Holcim Group, including Holcim companies in Poland, values you as our customers or as other individuals interested in the Holcim Group, as well as our products, technologies, or services. During our mutual relationship, we will collect and process certain personal data provided by you. This Data Protection Information explains how Holcim will use the personal data provided by you and informs you about the rights and options available to you in this regard.

The information concerns Personal Data provided to Holcim by you and data obtained on that basis. User information collected through cookies or other tracking technologies online is subject to our Cookie Policy, which can be found on the appropriate Holcim Poland website.

WHO IS RESPONSIBLE FOR YOUR DATA?

We, **POLCALC Nawozy Wapniowe Sp. z o.o.** with headquarters in Warsaw (02-305), Al. Jerozolimskie 142B ("Company"), a member of the Holcim Group, will be the data controller responsible for any personal data provided to us by you in connection with our business relationship.

The list of entities - Holcim companies in Poland is attached as Annex 1.

FOR WHAT PURPOSES DO WE USE YOUR DATA?

We will process your data only for the following purposes ("Permissible Purposes"):

- Planning, conducting, managing, and administering your (or third party with which you are associated) contractual business relationships with the Holcim Group, e.g., by executing transactions and orders for products or services, processing payments, conducting accounting, auditing, settlement, and debt collection activities, organizing shipments and deliveries, facilitating repairs and support services, and providing other services or items that you may request from us;
- Maintaining the security and protection of our products, services, websites, or other systems, preventing and detecting security threats, fraud, and other criminal or harmful activities;
- Ensuring compliance with legal obligations, such as compliance monitoring or record-keeping obligations (e.g., under antitrust law, export regulations, trade sanctions and embargo regulations, anti-bribery and corruption regulations, and internal regulations, or to prevent white-collar crime or money laundering), which may include automated checks of your contact and identification data against relevant sanctioned party lists and contacting you to confirm your identity in case of potential matches or recording your interactions with third parties, which may be relevant for competition protection purposes;
- Informing you, where permitted and by local law, about products and services offered by Holcim companies in Poland that are similar or related to those previously purchased or used within the current business relationship;
- Resolving disputes, enforcing our agreements, and asserting, defending, or responding to claims.
- Ensuring compliance with legal requirements, such as maintaining sales documentation for tax purposes or sending notifications and other information as required by law.

In cases where you have expressly consented, we may also process your data for the following purposes:

- Communicating with you through channels that you have approved to receive updates, special offers, and other information about products and services offered by Holcim (including through marketing newsletters) as well as information about Holcim events and projects;

- Managing and conducting special events including customer surveys, marketing campaigns, market analysis, lotteries, contests, or other promotional activities or events or
- Collecting information about your preferences to create a user profile and personalize and improve the quality of our communication and mutual relationships (e.g., through newsletter tracking or website statistics analysis).

Regarding marketing communication tools (i.e., emails and phone calls), we will only provide you with such information where legally required, after prior acceptance, and allow you to withdraw it if you no longer wish to receive such marketing-related communications from us.

We will not use your data to make any automated decisions about you or to create profiles other than those described above.

The legal bases for processing your data are set out in Article 6 of the European General Data Protection Regulation. Depending on the Permissible Purposes for which we use your data, its processing is necessary for the performance of a contract or other business agreement with Holcim, necessary to fulfill our legal obligations, or is necessary for our legitimate interests, provided that your interests or fundamental rights and freedoms do not override ours. Furthermore, processing may be based on your consent, if it has been unequivocally given to us.

SCOPE OF PERSONAL DATA

We may, in particular, collect and process the following categories of personal data:

- **Contact information**, such as full name, business address, business phone number, business mobile phone number, business fax number, and business email address,
- **Payment data**, such as necessary information for payment processing and fraud prevention, including credit and debit card numbers, security code numbers, and other billing-related information;
- Further **business-related information** necessary for processing within a project or contractual relationship with Holcim companies in Poland, or information voluntarily provided by you, such as placed orders, made payments, applications, and projects;
- Information collected **from publicly available sources**, data consistency databases, and credit rating agencies;
- If required **to maintain legal compliance**: information about significant legal disputes or other legal proceedings against you or a third party associated with you, as well as information about mutual relationships with you that may be relevant for competition protection purposes.
- **Special Categories of Personal Data**: In connection with registration for and providing access to an event or seminar, we may ask you for information about your health to identify and accommodate any disabilities or special dietary requirements you may have. Your consent is the basis for any use of such information. If you do not provide us with information about disabilities or special dietary requirements, we will not be able to take any appropriate precautions.
- **Other Personal Data**: Occasionally, we may ask you for additional information about yourself to send you messages with greetings on important occasions for you. Your consent is the basis for any use of such information.

HOW DO WE PROTECT YOUR DATA?

We maintain physical, electronic, and procedural safeguards following the latest technical requirements and data protection regulations to protect your data against unauthorized access or breach. These safeguards include the implementation of specific technologies and procedures designed to protect your privacy, such as secure servers, firewalls, and SSL encryption. We will always strictly adhere to applicable laws and regulations regarding the confidentiality and security of personal data.

TO WHOM WILL WE DISCLOSE YOUR DATA?

We may disclose your data:

- To companies affiliated with us in the Holcim Group worldwide, if permitted by law and to the extent necessary to achieve Permissible Purposes. In such cases, these entities will then use the personal data for the same purposes and on the same terms as described in this Privacy Data Information. The list of entities affiliated with Holcim is available on the [Holcim](#) website.
- To service providers (so-called data processors) within or outside the Holcim Group, domestically or internationally, such as shared service centers, instructed by us to process personal data for Permissible Purposes on our behalf and solely by our instructions. Holcim will retain control and remain fully responsible for your data and will utilize appropriate safeguards required by applicable law to ensure the integrity and security of your data when engaging such service providers.
- To any courts, law enforcement agencies, regulatory bodies, or lawyers, if legally permitted and necessary to fulfill a legal obligation or establish the legitimacy, assertion, or defense of claims. In other cases, we will disclose your data only when instructed by you or with your consent, when required by applicable laws and regulations, or when we receive official or judicial requests to do so, or when we suspect fraud or criminal activity.

WHERE DO WE PROCESS YOUR DATA?

Holcim operates worldwide. In the course of our business activities, we may transfer your data to recipients in countries outside the European Economic Area ("third countries") where the applicable law does not provide the same level of protection as the law in your home country. When we do so, we will comply with the applicable requirements regarding the protection of personal data and implement appropriate safeguards to ensure the security and integrity of your data, in particular by entering into EU Standard Contractual Clauses. You may contact us at any time using the contact details provided below if you wish to obtain more information about such safeguards.

YOUR RIGHTS REGARDING DATA PROTECTION

Subject to certain legal conditions, you have the right to request access to, rectification, or erasure of your data, as well as to restrict the processing of your data.

You also have the right to object to processing and to request data portability. In particular, you have the right to request a copy of the data that we hold. If you exercise this right repeatedly, we may charge an appropriate fee. Please refer to Articles 15-22 of the General Data Protection Regulation (GDPR) for detailed information about your rights regarding data protection. In the case of any of the above requests, please describe the personal data concerned and provide your name, surname, your customer number (or other Holcim identification number) using the contact details below. We may require additional evidence to confirm your identity to protect your data from unauthorized access. We will carefully consider your request, and we may wish to discuss with you how best to fulfill it.

If you have given consent to the processing of your data, you can withdraw such consent at any time with future effect; the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Upon withdrawal of consent, we may continue to process personal data where there is another legal basis for such processing.

If you have any concerns about how your data is being treated by us or wish to complain, you may contact us using the details provided below so that we can investigate the matter.

If you are not satisfied with our response or believe that we are processing your data unlawfully, you may complain to the relevant data protection supervisory authority: the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw, <https://www.uodo.gov.pl/en/p/contact>.

IS PROVIDING PERSONAL DATA REQUIRED?

As a general rule, you provide personal data entirely voluntarily; generally, refusing consent or providing personal data does not entail any negative consequences for you. However, in certain circumstances, Holcim may be unable to take action without certain personal data, for example, because such personal data is required to process orders, provide access to online offers or newsletters, or conduct legally required compliance checks. In such cases, if you do not provide us with your data, we may be unable to provide you with what you have requested from us.

DATA RETENTION PERIOD

Your data will be deleted when there is no longer a justified need to retain them for the Permitted Purposes or if you withdraw your consent (if applicable), and we are not legally obligated to continue storing such data or are otherwise entitled to do so. In particular, we will retain your data when necessary for Holcim to assert a claim or defend against a claim, until the end of the relevant retention period, or until the settlement of such claims.

UPDATES TO THIS PRIVACY INFORMATION

This Privacy Information was last updated in February 2024. We reserve the right to periodically make changes and corrections to this Privacy Information to reflect changes in the way we use your data or changes in legal requirements. In the event of any such changes, we will publish the amended Privacy Information on our website or make it available in another way.

HOW TO CONTACT US

If you have any questions, want to express your opinion, or wish to exercise your rights, please contact us at the following email address: pl-m-inspektor-ochrony-danych@holcim.com

Attachment No. 1. List of Holcim Companies in Poland:

1. Holcim Polska SA 2.
Holcim Kruszywa Sp z o.o.
3. Geocycle Polska Sp z o.o.
4. LH Engineering Sp z o.o.
5. Zakład Gospodarki Popiołami Sp z o.o.
6. Przedsiębiorstwo Produkcyjne PP Sp z o.o.
7. KOSD Przedsiębiorstwo Produkcyjne PP Sp z o.o. Sp. K.
8. POLCALC NAWOZY WAPNIOWE Sp. z o.o.
9. FUNDACJA HOLCIM
10. IZOLBET Sp. z o.o.
11. HM Factory Sp. z .o.o.