

Information clause for recording telephone calls

Pursuant to Article 13(1) and Article 13(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) (OJ EU L 2016 no. 119, p. 1) (hereinafter “**GDPR**”), please be advised that:

1. Data Controller and Data Protection Officer

The Controller of your personal data is Dom Development S.A. with its registered office in Warsaw, Pl. Piłsudskiego 3, 00-078 Warszawa. The Controller has appointed a Data Protection Officer, whom you may contact in respect of any matters relating to personal data protection by email at iodo@domd.pl or by post at the above-mentioned address of the Controller’s registered office, with the note “Data Protection Officer”.

2. Purpose and Legal Basis of Data Processing

The Controller processes your personal data for the following purposes:

- 1) to conduct communications and respond to your enquiries relating to the products and services offered by the Controller, as well as to perform contracts concluded with you and provide customer service, constituting the Controller’s legitimate interest (Article 6(1)(f) of the GDPR),
- 2) training purposes and to improve the quality of the products and services offered by the Controller, constituting the Controller’s legitimate interest (Article 6(1)(f) of the GDPR),
- 3) the establishment, exercise or defence of claims (if any) – the legal basis for data processing is that this data is required in order to pursue the Controller’s legitimate interest. In such a case, the Controller’s legitimate interest is the right of the establishment, exercise or defence of claims (Article 6(1)(f) of the GDPR).

3. Categories of Personal Data Processed

Recordings of telephone calls may contain your personal data in the following forms:

- a) your voice,
- b) your phone number, and
- c) other identifiable data from the recording.

4. Data Source

Your data is collected directly from you to enhance your security on the Controller’s premises.

5. Retention Period

Recordings of telephone calls containing your personal data will be retained for no longer than three months from the date of recording, unless it serves as evidence in legal proceedings or should the Controller become aware that this personal data might serve as evidence, in which case the retention period will be extended until such proceedings are concluded with a final award.

6. Data Recipients

Your personal data may be shared with entities that the Controller engages to perform tasks requiring data processing, such as email management, hosting, IT, administrative, legal, or advisory services. It may also be shared with providers of telecommunication, courier, insurance, billing, accounting, or security services, as well as any other parties to whom the Controller assigns tasks. Your personal data may also be shared with entities or authorities authorised to receive it - but only in justified cases and in accordance with applicable laws.

7. Your Rights

With regard to the processing of personal data, you have the right to: access, erase and transfer your personal data. If your personal data is processed on the basis of legitimate interests, you have the right to object to the processing for reasons associated with your particular situation. You have the right to file a complaint with the supervisory authority competent for personal data protection (President of the Personal Data Protection Office).

8. Voluntary Data Provision

The provision of data recorded during telephone calls is not a statutory or contractual obligation, and is voluntary. This data is collected automatically through a call recording system.

9. Transfer of Data Outside the European Economic Area

As the Controller sources IT tools and services externally, some of your personal data may be transferred to countries outside the European Economic Area, but only with appropriate legal basis.

Detailed information concerning the legal basis for such transfer is available from the Data Protection Officer.