

Call recording policy

CORAB S.A.

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We take your personal data and its protection very responsibly. This Corab Call Recording Policy sets out for what purpose and how we process your data in connection with call recording.

The document you are reading is based on personal data legislation, including the provisions of the GDPR (General Data Protection Regulation of 27 April 2016) or the Data Protection Act of 10 May 2018.

The content of the document is subject to change at any time. We will always keep you informed of changes and provide a version of the document. We work with entities that provide a high level of protection for the personal data we process.

Feel free to contact us!

For any matter related to the protection of your personal data, you can contact us through our Data Protection Officer (Ms. Katarzyna Krzywicka) at e-mail address: ido@corab.com.pl or telephone number + 48 794 509 753.

Data controller

The controller of your personal data is CORAB SPÓŁKA AKCYJNA with its registered office in Olsztyn (10-547) at ul. Michała Kajki 4, entered in the register of entrepreneurs kept by the District Court in Olsztyn, 8th Economic Division of the National Court Register under KRS number 0000950779, REGON (business ID): 510519084, NIP (tax ID): 7390207757, with a share capital of PLN 1,184,000.00 fully paid up.

What does the policy contain?

You may find here information, for example, about the principles of the processing your personal data in connection with our call recording, about the purposes for which we record individual calls

and for which we process your data, about the duration of storage of the recordings, as well as about the recipients of your data and your rights.

Recording of telephone calls – general information

As part of our company's telephone service system, we record outgoing and incoming calls. Calls are recorded in order to provide the highest possible standard of service to customers, potential customers and others who contact us by telephone, also to prevent misunderstandings about the information we provide in a call and to defend against possible claims. The recordings allow us to improve our telephone service and streamline our organisation. The legal basis for our decision to record calls is Article 6(1)(f) of the GDPR, i.e. the Controller's legitimate interest based on the purposes we have indicated above.

In the event that you contact us directly by telephone, we inform you before the call is made that the call will be recorded, we ask for your consent to the recording and indicate that if you do not wish your call to be recorded, you should discontinue the call.

In the event that we contact you by telephone, once you have been reached, our representative informs you that the call will be recorded and indicates that if you do not want your call to be recorded, you should discontinue the call.

Remember that you can always contact us in other ways, e.g. by sending us an e-mail or via the contact form available on our website.

For the sake of clarity, we have grouped the types of calls we make into the categories indicated below and briefly discuss each category of call so that you understand the recordings storage basis and duration.

We inform you that in the case of incoming calls, the call recording begins when you give us your consent to the recording (i.e. the call waiting time is not covered by recording, and the recording begins when you start the call with our representative).

In the case of incoming calls, the recording of the call begins as soon as you are reached, our representative informs you that the call is recorded immediately. Please note that if you do not agree to the recording then you can always end the call and contact us, e.g. by email.

Call categories

The matter for which you contact us by telephone determines the scope of your personal data that we process.

We discuss the types of calls below, together with an indication of the basis for processing personal data in connection with the call.

**Telephone call –
contact in connection
with a request for
information, Corab
S.A. portfolio.**

You can initiate contact with us yourself or ask us to contact you, e.g. via a form available on our website.

In this case, we process the data you provide (usually your first and last name, telephone number or email address) on the basis of your consent, i.e. on the basis of Article 6(1)(a) of the GDPR.

The call information, the recording of the call is stored by us for 30 days from the date of the call in this case.

After the call, we send you a summary of the call at your request or a trade offer if you ask for one. If you have any doubts about the summary we have sent you, please raise them with us immediately before the deadline for deleting the recording so that we can verify the findings made during the call. Once the recording is deleted, we cannot do this.

When contacting us by telephone, for example, you can ask about our products and we always try to provide you with important information, bearing in mind that all relevant information can be found in the manual supplied with the product and we recommend that you follow the manual if in doubt,

In the event that you place an order or make a complaint during the call, such call is processed by us for an extended period of time, subject to the terms of this document.

If we consider that information or topics that justify storing the call longer are indicated during the call (e.g. to defend against claims or to clarify an issue), we store the call until the matter is resolved, but no longer than is reasonable.

**Telephone call –
telephone contact for**

You have the opportunity to express your wish to receive commercial information from us regarding our company in the form of a telephone call. We will then provide you with information

**the presentation of
trade information in
connection with the
marketing consent**

about our products, promotional campaigns or other interesting information relating to our business according to your instruction to provide you with such information by telephone.

In this case, we process the data you provide (usually your first and last name, telephone number or e-mail address, the voivodeship in which you live) on the basis of your consent, i.e. on the basis of Article 6(1)(a) of the GDPR.

The call information, the recording of the call is stored by us for 30 days from the date of the call in this case.

After the call, we send you a summary of the call at your request or a trade offer if you ask for one. If you have agreed to receive our Newsletter, we may also send you trade information in this form. If you have any doubts about the summary we have sent you, please raise them with us immediately before the deadline for deleting the recording so that we can verify the findings made during the call. Once the recording is deleted, we cannot do this.

We will present trade information to you in the form of a telephone call until you withdraw your consent to receive it in this form or until the purpose for processing your data in this way ceases.

Please note that you can withdraw your consent to receive commercial communications from us by telephone at any time and we will not contact you on this basis from the time you withdraw your consent.

In the event that you place an order during a call, such call will be processed by us for an extended period of time under the terms of this document.

If we consider that information or topics that justify storing the call longer are indicated during the call (e.g. to defend against claims or to clarify an issue), we store the call until the matter is resolved, but no longer than is reasonable.

Telephone call – placing an Order

In the event that you wish to place an Order in our shop, you can contact us by telephone.

In this case, we process the data you provide (usually your first and last name, telephone number or e-mail address, address of residence, VAT ID and business name when you request an invoice) on the basis of a premise related to the pursuit of a contract, i.e. on the basis of Article 6(1)(b) of the GDPR.

The call information, the call recording related to the order placement, is stored by us for 30 days from the date of our confirmation of the conclusion of the contract in accordance with the sales regulations. If you have any doubts about the summary we have sent you, please raise them with us immediately before the deadline for deleting the recording so that we can verify the findings made during the call. Once the recording is deleted, we cannot do this.

After the call, we e-mail you a summary of the call with information about the order you wish to place and information allowing you to proceed with your order, we also allow you to read our sales regulation and the privacy policy and ask you to read and accept them and place your order.

If we consider that information or topics that justify storing the call longer are indicated during the call (e.g. to defend against claims or to clarify an issue), we store the call until the matter is resolved, but no longer than is reasonable.

Telephone call – complaints and guarantees

In the event that you wish to make or realize a complaint or warranty claim, we may contact you by telephone.

In this case, we process the data you provide (usually your first and last name, telephone number or e-mail address, data contained in the contract) on the basis of the contract concluded, i.e. on the basis of Article 6(1)(b) of the GDPR.

The call information, the recording of the call is stored by us for 30 days after the conclusion of the complaint or guarantee procedure.

After the call, we send you a summary of the call to the email address provided, asking you to confirm the information you have provided as part of the call and regarding the further course of action in the case. If you have any doubts about the summary we have sent you, please raise them with us immediately before the deadline for deleting the recording so that we can verify the findings made during the call. Once the recording is deleted, we cannot do this.

If we consider that information or topics that justify storing the call longer are indicated during the call (e.g. to defend against claims or to clarify an issue), we store the call until the matter is resolved, but no longer than is reasonable.

**Telephone call –
consent to receive
trade information
during the call**

As part of any telephone contact with us, you have the opportunity to give your consent to receive trade information from us regarding our company (in the form of a telephone call, in the form of a Newsletter in accordance with the Newsletter Terms and Conditions or in the form of a text message). We will then present you with information about our products, promotional campaigns or other interesting information relating to our business in accordance with your consent.

In this case, we process the data you provide (usually your first and last name, telephone number or e-mail address, the voivodeship in which you live) on the basis of your consent, i.e. on the basis of Article 6(1)(a) of the GDPR.

We store the call information, the call recording until you withdraw your consent to receive trade information from us or the purpose of the processing ceases.

Please note that you must confirm your Newsletter subscription in accordance with the Newsletter Terms and Conditions.

After the call, we send you a summary of the call upon your request, including confirmation of your consent to receive marketing information from us in the forms you have chosen. If you have doubts about the summary we have sent you, please raise them with us immediately.

We will present trade information to you in the form of a telephone call until you withdraw your consent to receive it in this form or until the purpose for processing your data in this way ceases.

Please note that you can withdraw your consent to receive trade information from us at any time and we will not contact you on this basis from the time you withdraw your consent. You may withdraw your consent by informing us in an appropriate form, e.g. by telephone (we will acknowledge receipt of the message and withdrawal of consent, and the call covering the withdrawal of consent will be deleted within 30 days of the date on which we delete your details from our database of consents for the presentation of trade information in the form of a telephone call; if you have any doubts about the message sent, please raise them with us immediately before the deletion date so that we can verify the arrangements made during the call – once the recording is deleted, we are no longer able to do so and you will no longer receive trade information from us in the form of a telephone call).

If we consider that information or topics that justify storing the call longer are indicated during the call (e.g. to defend against claims or to clarify an issue), we store the call until the matter is resolved, but no longer than is reasonable.

Your rights in relation to the processing of your personal data

We inform you that you have the following rights in relation to the processing of your personal data:

If you wish to exercise
your right, please write to
us at
support@corab.com.pl

1. **Right of access to information** – means that every person whose data is processed has the right to know what happens to their personal data. The privacy policy has been created for this purpose.
2. **Right of access to personal data** – if we, as the controller of your data, receive a request from you for access to your data, we are required provide you with such information. As the data controller, we are expected to fulfil our obligations in this respect immediately, no later than within one month. If this is not possible within this time limit, we are required to inform you at least whether we are processing your data, and then we may extend the deadline for providing a complete response to your request by two months.
3. **Right to rectification of personal data** – you can request that the controller of your data rectify inaccurate data or complete incomplete data.
4. **Right to erasure of personal data, right to be forgotten** – you may request us as the controller of your personal data to erase your data and inform the person to whom your data have been transferred of the erasure. You also have the right to demand that your data that have been made public be also erased by other controllers. As the controller of your data, we are also required, upon your request, to inform you of the recipients to whom your data to be erased have been transmitted.
5. **Right to restriction of processing** – you may request that the processing of your personal data be restricted. This is the case when, for example, you do not believe that your data are processed correctly or that we no longer need the data for the purposes of the processing.

6. **Right to object** – you may object to your data being processed by the controller.
7. **Right to data portability** – you may, under certain conditions, request that your data be transferred directly to another controller of your choice.
8. **Right to lodge a complaint** – as soon as you consider that our processing of your data violates the law, you can lodge a complaint with the President of the Personal Data Protection Office.
9. **Right to withdraw consent** – means that where data is processed on the basis of your consent, you have the right to withdraw it at any time. The withdrawal of consent does not affect the legitimacy of our processing of your personal data until you withdraw your consent.

Data recipients

Your personal data may be transferred to third parties whose services we use. We ensure that we carefully select the entities with which we work or whose services we use and are always guided by the assurance of adequate data protection.

In the list of entities, you may find information about the trusted entities whose services we use in connection with the processing of personal data in connection with us recording the telephone calls. They are divided into two groups – the first group is entities that process data within the European Union and the second group processes data outside the European Economic Area (e.g. in the US).

For transfers of personal data outside the European Union, entities carrying out such processing maintain an adequate level of data protection, in line with EU standards, for example, by applying the standard contractual clauses adopted by the European Commission.

Data processors in the European Economic Area:

JAMEL spółka z ograniczoną odpowiedzialnością S.K.A., NIP: 5842674718

(strony:corab.pl/en.corab.pl/de.corab.pl/panel.projektanta.corab.pl);

Nettom S.C. Anna Chrowska-

Ziajka, Tomasz Ziajka NIP

7393818444 (websites:

szkolenia.corab.pl/shopb2b.corab.

pl/

en.shopb2b.corab.pl/program.cora

b.pl/en.program.corab.pl”) B I M

M.r. Borkowski Spółka Jawna

NIP: 9271910925 (website:

sat.corab.pl)

Provider of IT system maintenance services.

Hetzner Online GmbH

DE812871812

(websites:corab.pl/en.corab.pl/panel.projektanta.corab.pl);

cyber_Folks S.A. NIP: PL

7822622168 (websites:

shopb2b.corab.pl/

en.shopb2b.corab.pl/program.cora

b.pl/en.program.corab.pl”) OVH

Sp. z o.o. NIP: 8992520556

(website training.corab.pl)

Hosting provider (maintenance of data on a server).

Streamsoft spółka z ograniczoną
odpowiedzialnością sp. k. NIP:
9291851723

Provider of ERP business software for business
management.

JAWASOFT S.C. Jacek
Zborowski, Waldemar Karaś NIP:
973 10 19 941

IT service provider.

Google Cloud Poland Sp. z o.o.
NIP: PL5252822767

Provider of Google services including the cloud service
and mail service.

Thulium sp. z o.o. NIP:
6783144527

Provider of customer service and customer contact
support software.

T-Mobile Polska S.A.; NIP
5261040567

Microsoft Azure cloud service provider.

BASELINE SP. Z O.O. SP. K.
NIP: 6793090715

Provider of business management software.

User.com Sp. z o.o. NIP:
5272791969

Provider of the system that handles our newsletter, our
forms and supports us in our marketing activities.

ABAK SPÓŁKA AKCYJNA,
NIP: 7390406362

Accounting service provider

PANDA MARKETING SP. Z
O.O. NIP 7393895746;
Performance Media P.S.A. NIP:
5213742952; AGENCJA NIE DO

Entities supporting the controller in marketing activities.

OGARNIĘCIA SP Z O O
SPÓŁKA KOMANDYTOWA
NIP 9442258450; Rather Tomasz
Jasionowicz NIP: 6852183632,
Starling Digital Piotr Szpakiewicz
NIP: 9562121535

Data processors outside the European Economic Area:

Celonis Inc. One World Trade
Center Celonis Inc.

The provider of software used to manage the data collected on our websites and within which you can initiate contact with us (filling in a form).

Recipients of your personal data may also be state authorities (such as the tax office) or entities that support us in the provision of legal assistance.

Withdrawal of data processing consent

If the processing of personal data is based on consent, you may withdraw this consent at any time – at your discretion. If you would like to withdraw your consent to the processing of your personal data, simply send an e-mail directly to the address indicated at the beginning of the document.

If you do not want our call to be recorded, please stop the call and contact us in another way, e.g. by e-mail.

If your personal data were processed on the basis of your consent, the withdrawal of your consent does not render the prior processing of your personal data unlawful. In other words, until you revoke your consent, we have the right to process your personal data and revoking your consent does not affect the lawfulness of previous processing.

Requirement to provide personal data

The provision of personal data is voluntary and depends on your decision, but the provision of certain personal data is necessary in order to fulfil your expectations for the conclusion of a contract.

If you contact us about any matter related to our products or services we provide, it may be necessary for you to provide your contact details in order to answer your question.

If your data is required by law – it is your responsibility to provide the data.

Automated decision-making and profiling

Your data is not used by us for automated decision-making that could affect your legal situation or have other similarly serious effects on you.

How long do we process your data?

In accordance with current legislation, we only process your data for the time it is needed to achieve the stated purpose. After this period, your personal data are irreversibly deleted or destroyed. As part of discussing the different categories of calls, we indicated how long we process the recording of our call. In cases where the recording constitutes evidence in proceedings under the law or where the recording may constitute evidence in the proceedings, we may store the call recording for longer, i.e. until the proceedings conclusion is final and non-appealable.

Final provisions

The content on our websites, including in this document, is a result of our own intellectual creativity. They are therefore subject to our copyright.

We do not give permission for the content to be copied in whole or in part without our express prior consent.

You are obliged/required to use our website in a manner that is in accordance with the law and good morals, bearing in mind respect for the personal rights and intellectual property rights of third parties.

Finally, we would like to remind you that the content of this Call Recording Policy is subject to change, e.g. when we change our service provider or when the legislation changes. For your convenience, the policy update date is stated at the beginning of the Policy.

That is all we have to share with you for now. Thank you for your time.