

THE ESSENCE OF THE ARRANGEMENTS BETWEEN JOINT CONTROLLERS

1. Joint purposes of personal data processing by Joint Controllers and the manner in which such data is processed have been set out in the Data Protection Policy.
2. Joint Controllers have defined their roles and the scope of responsibilities as required under the GDPR as follows:
 - (1) Joint Controllers declare that they process personal data in compliance with the requirements laid down in art 5 of the GDPR.
 - (2) Each Joint Controller keeps all records relating to joint control to the extent to which such records relate to the data subjects of that Joint Controller.
 - (3) Joint Controllers declare that they process personal data only if and to the extent that one of the bases for data processing set out in art 6 or art 9 of the GDPR applies and only in the relevant scope.
 - (4) Joint Controllers do not transfer personal data outside the European Economic Area. Should personal data ever be shared with third countries in the future, Joint Controllers shall comply with all the GDPR requirements and shall act in a manner that does not compromise the protection of natural persons.
 - (5) Each Joint Controller shall ensure appropriate protection of personal data and shall take steps to ensure protection of personal data as set out in art 32 of the GDPR, in accordance with further provisions of the Agreement.
 - (6) Each Party has made an assessment which demonstrates that none of the Parties are required to designate a Data Protection Officer.
 - (7) Joint Controllers declare that persons tasked with personal data processing have undergone training in the principles and regulations concerning personal data processing, and the consequences of non-compliance with such principles and regulations, and in particular in the personal data protection procedures and such persons' responsibilities in this regard.
 - (8) Responsibility to report breach of personal data protection to the supervisory authority rests with the Joint Controller whose actions led to the breach.
 - (9) Where a breach of personal data protection poses a significant threat to the fundamental rights and freedoms of natural persons, the Joint Controller whose duty it is to report the breach to the supervisory authority, must, without undue delay, notify the person who is directly affected by the breach.
 - (10) The contact person for any communication concerning a breach of personal data protection and for those who have been directly affected by the breach is the Manager of Crido's Legal Department. His phone number is: +48 22 324 56 41, and his email address: ernest.luczak@crido.pl .