

ADAMA FOR UKRAINE Privacy Policy for Contributors and ADAMA Refugees

Purpose of this Privacy Policy

We are committed to protecting your privacy and ensuring that your personal data is protected. The purpose of this Privacy Policy is to explain what we do with personal data that you provide to us ("**Personal Data**").

Data Controller

Controller of your personal data is ADAMA Polska sp. z o.o. with its registered office in Warsaw, address: ul. Sienna 39, 00-121 Warsaw ("**ADAMA Polska**").

Purposes and Legal Bases for Processing of Personal Data

We may process your Personal Data for the following purposes:

If you are the **ADAMA Refugee**:

Legal Purpose	Legal Basis
To verify your needs and to provide you with support within Fundraising.	Legitimate interest of ADAMA Polska (art. 6 sec. 1 let. f of the GDPR).
To comply with legal regulations, including accounting and tax obligations imposed by law.	Performance of legal obligations (art. 6 sec. 1 let. c of the GDPR).
To verify your special needs and to provide you with support.	Explicit consent to processing sensitive personal data (e.g. prescriptions, health information) (art. 9 sec. 2 let. a of the GDPR).
To perform internal analyses regarding financial consequences and effectiveness of the Fundraising.	Legitimate interest of ADAMA Polska (art. 6 sec. 1 let. f of the GDPR).

If you are the ADAMA Employee participating in the Fundraising ("**Contributor**"):

Legal Purpose	Legal Basis
To obtain and to manage your contributions to the Fundraising.	Legitimate interest of ADAMA Polska (art. 6 sec. 1 let. f of the GDPR).
To comply with legal regulations, including accounting and tax obligations imposed by law.	Performance of legal obligations (art. 6 sec. 1 let. c of the GDPR).

To perform internal analyses regarding financial consequences and effectiveness of the Fundraising.	Legitimate interest of ADAMA Polska (art. 6 sec. 1 let. f of the GDPR).

How we obtain your Personal Data

Where Personal Data is not collected directly from you (e.g. via the website form) we may obtain your personal data from:

If you are the **ADAMA Refugee**

- your family member (or any other person) fulfilling website form including your personal data;
- another ADAMA Group entity or ADAMA Employee which has obtained your Personal Data from you or from your family member (or other person fulfilling the website form).

Scope of obtained personal data includes data you have inserted in the form, which may include your name; surname; company; job position; location; bank account and information on your needs and any other data included within website form.

If you are the **Contributor**:

We will obtain your Personal Data from the details of the bank transfer. Data will be limited to the information provided by making bank transfers (e.g. your name, bank account, amount of transferred funds).

How We May Share Personal Data

We may share Personal Data about **Contributors** and **ADAMA Refugees** among the companies of our global ADAMA Group, including in third countries without adequate data protection, for purposes related to the internal analysis and management (including effectiveness of the Fundraising).

We share your Personal Data with our service providers who perform services on our behalf for the purposes described above. In particular, we share Personal Data with providers of hosting services and IT support. The service providers are bound by law and/or contract to protect the confidentiality and security of Personal Data, and to only use Personal Data to provide requested services to us in accordance with applicable law.

We share your Personal Data with other companies, vendors and business partners which perform certain functions for us, whereby these companies are themselves responsible to determine the purposes and/or means of the processing and for the lawfulness of the processing, in particular, such as banks.

International Transfers of Personal Data

Given that ADAMA Group companies are located all over the world, we may need to transfer your Personal Data internationally. Some countries outside the European Economic Area in which group companies are located, namely Israel and Switzerland, have been officially recognized as providing an adequate level of protection for Personal Data. The transfer of Personal Data to other non-EEA countries which do not have the same level of protection as in the EEA, takes place on the basis of European Commission's standard contractual clauses for data transfers, and in accordance with applicable data protection laws.

Some of the service providers and other third parties with whom we share Personal Data may also be located in non-EEA countries that do not provide an adequate level of protection for Personal Data. Transfers to these third parties take place using an acceptable lawful data transfer mechanism, such as the EU- standard contractual clauses for data transfers.

How Long Do We Keep Your Personal Data

Your Personal Data will be stored for the period of the Fundraising. However, some of your Personal Data will be processed after the end of Fundraising for provision of the support, as well as for the performance of internal analysis of the Fundraising effectiveness but not longer than for the period required to comply with legal regulations, including accounting and tax regulations.

Your Rights Relating to Personal Data

The following rights in relation to the processing of your Personal Data, apply to you:

Access

You have the right to obtain from us confirmation if your Personal Data is being processed, relevant information about such processing as provided by applicable EU data protection laws, and a copy of the Personal Data undergoing processing.

Rectification

You have the right to obtain from us the rectification of inaccurate Personal Data concerning you and to have incomplete Personal Data completed. However, no changes to Personal Data will be permitted where the change would result in incorrect information or would alter a transaction with us already completed.

Restriction

You may request to restrict processing of your Personal Data.

Erasure

You may request to erase (delete) your Personal Data.

Right to lodge a complaint

You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your residence, place of employment, or the location where the issue that is the subject of the complaint occurred.

Right to object

You have the right to object to the processing of your Personal Data on the basis of the legitimate interest due to your particular situation.

Right to refuse or withdraw consent – applies to ADAMA Refugees

You are free to refuse to give consent and you can withdraw (with effect for the future) your previously provided consent to the processing of Personal Data at any time without any adverse negative consequences. The lawfulness of any processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

Portability – applies to ADAMA Refugees

You have the right to receive the Personal Data concerning you which you have provided to the controller in a structured, commonly used and machine-readable format and have the right to transmit that Personal Data to another controller without hindrance from the controller.

Automated Processing

You will not be the subject to a decision based solely on automated processing, including profiling.

Contact Information

If you have any questions about this Privacy Policy or would like to exercise your rights, please contact us:

- by email: rodo@adama.com
- by phone: +48 22 395 66 60
- in writing: ADAMA Polska Sp. z o.o. ul. Sienna 39, 00-121 Warszawa.