

## Information about the processing of personal data of persons contacting via the helpline or email. Things you need to know.

### Data protection is very important to us.

That is why in this privacy notice we want to explain to you what information we collect about you, who is responsible for protecting your data, with whom we share your data and what your rights are if you contact us via the helpline or by email.

### 1. What terms do we use in this information?

**TSL** means TSL Services spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw. This company provides services to the Partner (e.g. in the area of contact with clients).

**Partner** means the entity that is supported by TSL and performs the transport order for which you contact us (or we contact you). You can find information on which entity performs the transport order e.g. in a transport order document.

**Example:**

Suppose that the order you contact us about is performed by SolidCargo sp. z o.o. (Partner). TSL supports SolidCargo sp. z o.o. with e.g. contact with clients via helpline or by email. That's why you are redirected to TSL.

**We** means:  
✓ separately TSL and Partner,  
✓ together TSL and Partner.

**You** means the person who contacts us (or we contact that person) via the helpline or by email in connection with a particular order performed by the Partner.

### 2. Who is the controller of your personal data?

The data controller is the entity that is responsible for your personal data and its security.

These entities are separate controllers of your personal data:

- (1) **Partner** insofar as the data is used for the performing of the transport order;
- (2) **TSL** only to the extent that recordings of helpline calls or the content of correspondence are used to improve the quality of TSL's services and ensure the communication security.

TSL provides the Partner with your personal data collected during the communication.

**Let's explain:**

The Partner uses TSL's services e.g. in the area of contacts with clients and customers. Therefore, TSL acts both as a processor of personal data, processing personal data on behalf of the Partner, and also as a separate controller of personal data to the extent that it uses personal data for its own purposes (e.g. call recordings for the purpose of improving the quality of services provided by TSL).

### 3. How can you contact us?

If you have questions or requests regarding your personal data, you can contact the controllers:

- (1) via email address: [[rodo@tslservices.pl](mailto:rodo@tslservices.pl)];
- (2) by sending traditional correspondence to the following address: ul. Franciszka Bohomolca 21, 01-613 Warsaw.

### 4. What personal data do we process and from what sources?

We receive your personal data directly from you when you provide us with information during a call or in a message you send us, in particular data such as your name, surname, contact details (e.g. email address, telephone number), place

of work, position and, depending on the form of contact: a voice recording, including the content of the conversation or the content of correspondence.

If we contact you about the order, it means that we have received your personal data during the conclusion and performance of the order, e.g. from your employer or directly from you.

**5. Is the provision of personal data mandatory or voluntary?**

- (1) **Mandatory data:** You must provide us with the tax number (NIP) of the company on behalf of which you are contacting us and the transport order number, so we can process your request. We may also need your name, surname and position.
- (2) **Voluntary data:** You can choose if you want to be recorded during a call with us over the helpline. If you don't agree, then please choose to contact us by e-mail at: [cs@tsslservices.pl](mailto:cs@tsslservices.pl).

**6. For what purposes and on what legal bases do we process your personal data?**

Partner and TSL, as separate controllers of your personal data, have different purposes and legal bases for processing your personal data. We explain what these purposes and legal bases are below.

Data controller	Purposes and legal bases
<p><b>Partner</b></p>	<p><b>A. Purpose: processing of request regarding a transport order</b></p> <p><u>Legal bases:</u></p> <ul style="list-style-type: none"> <li>• the performance of the order concluded directly with you (Art. 6(1)(b) GDPR), or if you are a representative of the entity with which the Partner has concluded the order or you are contacting us about the order as another person, then the basis for processing your personal data is the legitimate interests pursued by the Partner in processing your request and ensuring the correct performance of the order concluded with its customer (Art. 6(1)(f) GDPR);</li> <li>• in addition, if the communication relates to activities arising from law, e.g. relating to complaints, then the legal basis for processing the data may be the necessity to fulfil the Partner's legal obligations (Article 6(1)(c) GDPR);</li> <li>• if we contact via helpline, your call is recorded based on your voluntary consent to the recording of the call (Article 6(1)(a) of the GDPR);</li> </ul> <p><b>B. Purpose: determination, assertion or defence of claims</b></p> <p><u>Legal basis:</u></p> <ul style="list-style-type: none"> <li>• the Partner's (or a third party's) legitimate interest in being able to determine, assert or defend against claims related to the order or the communication (Article 6(1)(f) GDPR).</li> </ul>
<p><b>TSL</b></p>	<p><b>A. Objective: to improve the quality of services and the communication security</b></p> <p><u>Legal bases:</u></p> <ul style="list-style-type: none"> <li>• our legitimate interest to improve the quality of the service provided by TSL and to ensure the communication security by monitoring its content (Article 6(1)(f) GDPR);</li> <li>• if we contact via helpline, your call is recorded based on your voluntary consent to the recording of the call (Article 6(1)(a) GDPR);</li> </ul> <p><b>B. Purpose: determination, assertion or defence of claims</b></p> <p><u>Legal basis:</u></p> <ul style="list-style-type: none"> <li>• TSL's (or a third party's) legitimate interest in being able to assert or defend against claims related to the communication (Article 6(1)(f) GDPR).</li> </ul>

## 7. Who can we share your personal data with?

Your personal data can be shared with entities providing services to us, in particular providers of helpline and email communication systems, legal advisers, IT service providers, accounting outsourcing providers, as well as postal operators, courier companies. The Partner may also share personal data to its subcontractors, e.g. to companies in the group of companies to which it belongs, if they are involved in the performance of an order. Personal data may also be shared to entities authorised under generally applicable laws, in particular to institutions authorised to control the activities of controllers or to institutions authorised to obtain personal data on the of legal provisions.

## 8. How long do we keep your personal data?

- A. We keep recordings of calls for a period of 3 full calendar months counted from the date the recording was made.
- B. However, we keep the information we have collected from recorded calls (e.g. in the form of written notes) and the content of email correspondence for the duration of the order to which the communication relates and thereafter for the period of limitation of any claims..

The time limits indicated in points A. and B. above may be extended if there are proceedings relating to claims in connection with the communication or order (until such proceedings are final).

## 9. What rights do you have?

You have the following rights regarding the protection of your personal data:

- access to data, including obtaining a copy of data,
- rectification of data (with the exception of the voice recording itself),
- erasure of data,
- restriction of data processing,
- data portability (this right applies to data that we process on the basis of your consent or which are necessary for the conclusion and execution of an order),
- object to the processing if we are processing your data on the basis of our legitimate interest. We will take your objection into account if it's legitimate (after balancing our and your interests and rights),
- withdraw your consent to the processing of your voice recording at any time. We will then delete the recording, but we may continue to process the personal data you provided to us in the content of the call on the other legal basis indicated above. The withdrawal of consent doesn't affect the lawfulness of the processing of your data prior to the withdrawal of consent. You can withdraw your consent by contacting us at: [[rodo@tslservices.pl](mailto:rodo@tslservices.pl)],
- lodge a complaint with the President of the Office for Personal Data Protection (address: ul. Stawki 2, 00-193 Warsaw), more information [here](#).

If you make a request for your personal data, we may ask you to answer questions to verify your identity.

## 10. Do we transfer your personal data outside the EEA?

We process your personal data within the EEA. The EEA is the European Economic Area, i.e. the European Union (EU) plus Iceland, Norway and Liechtenstein.

We use service providers that operates within the EEA and don't transfer your data outside the EEA. However, it may be the case that some of our IT providers (due to the global nature of such services) may process your personal data outside the EEA. If this is the case, we secure such transfers of data outside the EEA in accordance with data protection legislation. We mainly apply the European Commission's standard contractual clauses and assess such data transfers for security in accordance with legal requirements. If you'd like to find out more about the safeguards we apply to data transfers outside the EEA (including obtaining a copy of such safeguards), please contact us (see section 3. of this privacy notice for contact details).

## 11. Do we use profiling or automated decision-making?

We don't make automated decisions based on your personal data, neither do we carry out profiling.