



## PRIVACY AND COOKIES POLICY

### DEFINITIONS:

The following definitions are provided to help you navigate this Privacy and Cookies Policy.

**Policy:** this Privacy and Cookies Policy.

**RODO [GDPR – General Data Protection Regulation]:** 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).

**Company/Mentor:** Mentor S.A. with its registered office in Toruń at Szosa Chełmińska 177-181, entered in the Register of Entrepreneurs, kept by the District Court in Toruń, 7<sup>th</sup> Economic Department of the National Court Register, under KRS number 0000031423, NIP 956-00-03-240, with a share capital of PLN 784,628.00 (paid in full).

**Service:** the Company's website operated under the domain of mentor.pl.

**Operator of the Service:** Mentor S.A. with its registered office in Toruń at ul. Szosa Chełmińska 177-181, entered in the Register of Entrepreneurs kept by the District Court in Toruń, 7<sup>th</sup> Economic Department of the National Court Register, under KRS number 0000031423, NIP 956-00-03-240, with a share capital of 784.628,00 zł (paid in full).

**Cookies** are small text files/small data packages that are exchanged between your browser and our server. They do not cause any damage and serve only to recognise websites. The term cookies also refers to other tracking technologies that may be used within the operation of the Service.

**Brokerage Client:** an adult natural person with full legal capacity, a legal person or another entity not being a legal person, with legal capacity, using the insurance mediation services of Mentor S.A.

**Client:** a natural person of age, possessing full legal capacity, a legal person or another entity not being a legal person, possessing legal capacity, using services of Mentor S.A. other than insurance mediation.

**User:** a natural person of full legal capacity, using the Service for private, professional or business purposes, regardless of their nature.

**Insurer:** an insurance company providing insurance cover, including within the framework of insurance agreements concluded by brokerage Clients through the mediation of Mentor.

**Agreement for the provision of brokerage services:** an agreement concluded between Mentor S.A. and a brokerage Client for the provision of insurance mediation services.

**Agreement for the provision of other services:** an agreement concluded between Mentor S.A. and the Client for the provision of services offered by Mentor S.A., not belonging to insurance mediation services.

The terms contained in the Policy refer to the definitions in **Article 4 of the RODO** and other definitions taken into account in other legislation applicable to the matter covered by the Policy.

## PURPOSE OF THE POLICY

Mentor processes personal data in accordance with applicable **data protection and data security legislation**. When contacting our employees, expressing your interest in the services provided by the Company or deciding to cooperate with Mentor, there is often a flow of personal data between different entities. Processing of personal data, however, requires defining the principles of such processing and acting lawfully in this respect.

This Policy is intended to familiarise you with the functioning of Mentor in the context of personal data processing in connection with the activity performed.

The personal data protection provided by Mentor S.A. complies with the RODO and other regulations concerning personal data protection, including national regulations applicable to all entrepreneurs as well as entities from the insurance sector.

**Mentor S.A., as an insurance distributor**, is obliged to maintain the principles of diligence in the flow of information, including personal data. Additional obligations imposed on the insurance broker in the scope of insurance distribution guarantee you increased security of information and personal data transferred.

## THE SCOPE OF THE POLICY APPLICATION

The Policy regulates the principles of Mentor S.A. procedure with personal data processed in connection with the activity conducted by the Company and applies to the data of Clients, brokerage clients, partners of Mentor S.A. and persons participating in the recruitment process and other processes connected with the establishment of cooperation.

Your personal data made available to Mentor S.A., are processed only by the Company, i.e. its employees and associates possessing authorisation to process the specified personal data, in the course of performance of their professional activities. In the case of transferring your data to other entities - most frequently these will be associated companies, entities performing activities for Mentor S.A. on an outsourcing basis or other participants of the insurance market, all activities in this respect shall be in accordance with RODO and covered by your consent, if such consent is required.

With regard to services other than insurance mediation, we only occasionally process personal data, due to the fact that these are usually advisory services that do not require such processing.

In addition, we would like to inform you that outsourcing or other Mentor business relationships requiring further transfer of personal data is not a standard activity of the Company. Most activities are performed within the legal and organisational framework of Mentor S.A., which increases the security of the personal data transferred to the Company.

Moreover, depending on the language version of the Portal and limitations of its functionality related to the chosen language, the scope of processing of your personal data may vary.

At the same time, we would like to draw your attention to the fact that the Policy is of informative nature, and all processes related to the processing of personal data are developed in detail and followed in connection with the ongoing cooperation of the Company with particular entities.

If you have any questions regarding the Policy or the processing of your personal data by Mentor, you can contact us via e-mail [iod@mentor.pl](mailto:iod@mentor.pl) or in writing to the address Szosa Chełmińska 177 - 181, 87 -100 Toruń (with the note: Personal Data Inspector).

## PERSONAL DATA IN THE INSURANCE MARKET

Mentor as an insurance broker does not act on behalf of the Insurer but on behalf of its brokerage clients. It receives the vast majority of personal data directly from them or other persons involved in the process of negotiating, concluding and performing insurance contracts or insurance guarantee contracts. Often the administrators of the data provided to the Company are brokerage Clients who process, for example, the data of their employees or members of associations or other organisations.

Insurers in most cases are the administrators of personal data to the extent of personal data necessary to perform the insurance agreement.

The transfer of personal data to Insurers shall take place with or without the mediation of Mentor, depending on the agreed type of cooperation, the course of insurance processes, including the tools used for these processes.

Personal data are transferred to the Insurer, who is obliged to comply with all obligations of a data administrator, to maintain insurance secrecy and to process the data only for the purposes specified by law, unless otherwise stipulated in contracts or other declarations. Therefore, the processing of your personal data in the use of insurance and insurance mediation services is subject to the guarantees resulting from the law.

## MENTOR AS OF PERSONAL DATA ADMINISTRATOR

Mentor as a data administrator processes personal data of Clients, brokerage Clients and other persons with whom the Company has business and other relationships. However, it is common for Mentor to process data as a processor or sub-processor, as described in the "Mentor as Processor" section below.

The administrator of your data in the case of self-determination of the purposes and means of processing of personal data received in the course of the Company's business is:

Mentor S.A. with its registered office in Toruń, 177-181 Szosa Chełmińska Street, hereinafter referred to as the Administrator. The person who may be contacted in all matters related to their processing is the Data Protection Inspector: [iod@mentor.pl](mailto:iod@mentor.pl).

The scope of personal data processed by Mentor as a data administrator includes, among others, the following categories of data:

- identification data such as name, surname, PESEL, ID number, residential address
- communication data such as telephone number, e-mail address, communicator ID
- data necessary to conclude or modify insurance agreements
- data necessary for providing other services by the Company
- data necessary for recruiting employees, trainees or other co-workers

In the case of processing other personal data or other categories of personal data, information in this respect shall be provided as part of the fulfilment by the Mentor of its information obligation.

The personal data listed above may also be processed by the Mentor as a data processor.

Mentor acquires only such personal data which are relevant for the proper provision of services or the proper course of other processes occurring in the Company and in the insurance market and other business sectors in which Mentor undertakes its activities.

## PURPOSES AND BASIS FOR PROCESSING PERSONAL DATA

The determination of the legal basis applicable to a specific processing of personal data depends on the purpose for which your data will be processed.

The following are the most typical situations of data processing by Mentor S.A. as a personal data administrator

Mentor processes the personal data of the entities listed above in accordance with the following grounds for the purposes set out below (having the character of an open catalogue):

- in accordance with the basis indicated in Article section 1 letter A) of the RODO, i.e. a consent expressed explicitly or implicitly for the purpose of providing services or for the purpose of sending unsolicited commercial information with the use of automated calling systems or telecommunication terminal equipment or for the purpose of carrying out recruitment for a given position or using the application of a given person for possible future recruitment processes,
- in accordance with the basis indicated in Article section 1 letter B) of the RODO in order to execute agreements concluded by Mentor S.A. such as service agreements or other cooperation agreements and to perform certain activities prior to their conclusion,
- in accordance with the basis indicated in Article section 1 letter C) of the RODO in order to fulfil obligations resulting from legal regulations, including obligations connected with acting on the market as an insurance distributor,
- in accordance with the basis indicated in Article section 1 letter D) of the RODO in order to protect the vital interests of its Clients and brokerage Clients or other persons whose data Mentor holds,
- in accordance with the basis indicated in Article section 1 letter F) of the RODO in order to defend against potential claims related to the use by Clients, brokerage Clients or other persons of services provided by the Company (the necessity of processing in this case results from the Administrator's justified interest),
- in accordance with the basis indicated in Article 9 of the RODO (the specific basis will depend on the circumstances of the processing) in order to perform insurance agreements, including providing the data subject with the best possible insurance cover.

You have the right of access to the content of the personal data provided, its correction and transfer. You have the right to request erasure, restriction of processing, to object or to withdraw your consent to the processing of your personal data at any time. The above requests should be sent to the following e-mail address: [iod@mentor.pl](mailto:iod@mentor.pl) or in writing to the address of Szosa Chełmińska 177 - 181, 87 -100 Toruń (with a note: Inspector of Personal Data).

Personal data will be processed until there is a basis for their processing, i.e. in the case of granting consent until its withdrawal or restriction, in the case of fulfilling obligations arising from the provisions of law until they are fulfilled, and in the case of processing due to the legitimate interest of the Administrator until the existence of this interest.

You have the right to lodge a complaint to the President of the Office for Personal Data Protection if you consider that the processing of personal data by the Administrator violates the law.

If the provision of the service requires your express consent to the processing of personal data, failure to give your consent will result in you not being able to use the service in question.

## MENTOR AS A PROCESSOR

Mentor processes personal data not only as a result of receiving it directly from the data subject and often does not become the administrator of the personal data provided. The processing of data by the Company often takes place in connection with the performance of brokerage activities in respect of group insurance agreements intended for employees of the brokerage client or other persons covered by such insurance. Also, other insurance agreements and other services provided by Mentor may require processing of personal data by the Company as a processor or sub-processor. Many times, Mentor does not decide on the purposes and means of processing the personal data it receives in connection with the provision of services.

The Client or brokerage Client, as well as any other contractor of Mentor, may entrust the processing of personal data to the Company as a processor of personal data within the meaning of Article 28 of the RODO. In such a case, an agreement on entrustment of personal data processing will be concluded.

Therefore, it is important, whenever entering into cooperation with us, to determine the principles of transfer and subsequent processing of personal data between Mentor and the Client, the brokerage Client or other persons with whom the Company has business and other partnership relations.

## Cookies

The website - service mentor.pl uses few cookies. Not all of those described below are used. However, along with changes to the website, including the functionalities available on it, the scope of Cookies used may be modified.

Depending on their function, Cookies fall into the following categories:

- **Cookies necessary** from a technical point of view, required to perform basic functions by the website.
- **Statistical cookies** to understand how visitors (anonymised) behave when visiting the website.
- **Marketing cookies** aimed at applying targeted advertising actions towards the Users of the website.

When the Policy comes into force, i.e. 20.03.2021, we use the following statistical cookies:

- Google Analytics cookies - used to provide statistics for our website; the exact operation and privacy policy of Google Analytics can be found at <https://marketingplatform.google.com/about/analytics/>

## Changes to the privacy policy

In the interest of clarity of the message conveyed to you with regard to the protection of personal data and the use of cookies, we inform you that the Policy may be amended in the event of such a need (which may arise from the provisions of law or the Company's will to include new, emerging issues in the Policy).

The Policy is effective as of 29.03.2021. In the case of any changes, we will also include in the Policy information about the date of commencement of the Policy in its new wording.