Privacy Policy

I. Personal Data Controllers/Joint Controllers and personal data processing operations

1. Veolia Energia Warszawa S.A. is the personal data controller in the following operations:

Name of processing operation	Purpose of processing	Categories of data subjects	Type of personal data	Data retention period
Debt collection	The debt collection process is conducted in order to recover receivables for provided services.	clients - debtors, representatives of clients - debtors	name and surname, NIP (Tax Identification Number), PESEL (National Identification Number), REGON (National Business Registry Number), ID card number and series, address (there may be several), phone number, e-mail address, bank account number, receivable (debt amount), judgment, payment order, court ruling, case reference number	3 years from the recovery of receivables or the performance of the last action on personal data in the debt collection process

Update date: 2026-10-15

Sales, Marketing, Shareholders	The sales process is conducted in order to present an offer of our own products and services and to conclude a contract. The marketing process is conducted to enable the presentation of an offer of our own products and services via dedicated communication channels. Execution of the legal relationship between Veolia Energia Warszawa S.A. and the shareholder in connection with the shareholder status in accordance with the articles of association of Veolia Energia Warszawa S.A., and in order to fulfill the public law obligations of Veolia Energia Warszawa S.A. related to the functioning of joint-stock companies, including obligations arising from the Commercial Companies Code and other regulations regarding the functioning of the company.	potential clients, clients, shareholders, heirs, legal successors, proxies	names and surnames, residential or stay address, PESEL record number, NIP, REGON, KRS (National Court Register number), phone number, e-mail address, bank account number name, surname, phone, e-mail address, correspondence address, PESEL, ID card number, plot numbers, land and mortgage register (KW) numbers name and surname, father's name, address details, PESEL, ID card number, bank account number, number of shares, share series and number	6 years from the termination of the contract until consent is withdrawn or an objection is lodged 5 years from the last action performed on the shareholder's data
Industry consultations (Applicants)	Processing of applications.	designers, investors, clients (recipients)	name, surname, address, phone number, e-mail address, license/authorization number, date of birth, PESEL, ID card number, parents' names, plot number, plot area, ownership share in the entire property	5 years from the acceptance of the application

Real estate management	Use of real estate and district heating network infrastructure, as well as handling related proceedings and claims.	employees, tenants, owners/perpetual usufructuaries of real estate	name, surname, address, phone number, e-mail address, license/authorization number, date of birth, PESEL, ID card number, parents' names, plot number, plot area, ownership share in the entire property	for a period no longer than is necessary for the purposes for which they are processed, depending on the specificity of a given activity related to the aforementioned purpose. As a rule, personal data is processed for the period necessary to carry out a given activity (e.g. the duration of a contract, investment, or the establishment of a proceeding, a claim and its satisfaction, provision of a given service or handling of a given project) and for the subsequent limitation period of potential claims related to them.
Monitoring and security of facilities	Ensuring the safety of persons present on properties administered by the Company Veolia Energia Warszawa S.A., protecting the Company's property, inspecting the Company's district heating equipment.	employees, third parties	video recording, name and surname, document number with a photo, time and date of entry/exit, registration number	14 days video monitoring recording; entry/exit records: Warsaw location at ul. Batorego 2: until the end of the month following the month in which the data was made available; other locations: until the end of the year following the year in which the data was made available

Update date: 2026-10-15

Monitoring of company cars (GPS)	Ensuring work organization enabling full use of working time and proper use of the work tools provided to the employee, as well as ensuring employee safety or property protection or production control.	employees	route from where to where and when, driver, technical parameters: speed, fuel consumption (including rapid), engine RPM, refuelings	3 years
Technical documentation	Creation, use, and making available of documentation and technical designs, e.g. on the website in order to receive a reliable offer and place an order for construction work. Sending a newsletter by Veolia Energia Warszawa S.A. regarding current information on changes in technical requirements and guidelines for designers and contractors.	designers, contractors, surveyors, owners of real estate through which heating installations pass, persons representing entities requiring consultation, proxies	name, surname, position, address, phone number, e-mail address, license/authorization number, date of birth, PESEL, ID card number, parents' names, plot number, plot area, ownership share in the entire property	for the entire existence of the facility in accordance with the requirements of the Construction Law; regarding the newsletter - until resigning from receiving commercial information from the Controller or until objecting to the processing of personal data for marketing purposes
External communication	The process involves managing and maintaining a database of journalists for the purpose of communicating information about the Company, including its activities or projects, as well as building reputation and media, promotional, business, and marketing relations.	Journalists, editors, columnists, reporters of traditional and electronic media, members of business organizations and associations	name, surname, e-mail address, phone number, or other information related to the place of employment/activity (e.g. name of the newspaper, portal, as well as the job title of the person)	until such data ceases to be useful or until an effective objection is submitted

Whistleblowers	Fulfilling obligations related to the protection of whistleblowers in accordance with the Act on the protection of whistleblowers of June 14, 2024, including accepting reports, undertaking follow-up actions.	whistleblower, witnesses, other persons indicated in the report, associated person, person concerned by the report, person assisting in making the report	names and surnames provided in the report, personal data relating to the reported breach, other personal data	Personal data and other information in the internal report register are kept for a period of 3 years after the end of the calendar year in which follow-up actions were completed, or after the conclusion of proceedings initiated by these actions. Personal data processed in connection with accepting a report or taking follow-up actions and documents related to this report are kept for a period of 3 years after the end of the calendar year in which the external report was forwarded to the public authority competent to take follow-up actions, or follow-up actions were completed, or after the conclusion of proceedings initiated by these actions.
Recording of telephone conversations	Protection of the Controller's image by documenting telephone conversations conducted from telephones used in selected organizational units of the Controller.	employees, clients, persons reporting a failure	name and surname, phone number, other data provided during the conversation	until an objection is lodged, but not longer than 3 years from the moment the conversation was recorded

2. The Joint Controllers of personal data within the Veolia Group in Poland are the following Companies:

Name/company of Veolia Company	Veolia Company Abbreviation	Regional Company
Veolia Energia Polska S.A. registered in Warsaw, address: ul. Puławska 2, 02-566 Warsaw, KRS: 0000006129	VPOL	No
Veolia Centrum Usług Wspólnych Sp. z o.o. registered in Poznań, address: ul. Energetyczna 3, 61-016 Poznań, KRS: 0000261026	VCUW	Yes
Veolia Energia Warszawa S.A. registered in Warsaw, address: ul. Stefana Batorego 2, 02-591 Warsaw, KRS: 0000146143	VWAW	Yes
Veolia Term S.A. registered in Warsaw, address: ul. Puławska 2, 02-566 Warsaw, KRS: 0000071545	VTERM	Yes
Veolia Energia Poznań S.A. registered in Poznań, address: ul. Energetyczna 3, 61-016 Poznań, KRS: 000020765	VPOZ	Yes

Veolia Energia Łódź S.A. registered in Łódź, address: ul. Jadzi Andrzejewskiej 5, 92-550 Łódź, KRS: 0000041013	VLOD	Yes
Veolia Industry Polska Sp. z o.o. registered in Poznań, address: Al. Solidarności 46, 61-696 Poznań, KRS: 0000224818	VIND	Yes
Veolia Północ Sp. z o.o. registered in Świecie, address: ul. Ciepła 9, 86-105 Świecie, KRS: 0000111425	VPLN	Yes
Veolia Południe Sp. z o.o. registered in Tarnowskie Góry, address: ul. Zagórska 173, 42-600 Tarnowskie Góry, KRS: 0000212092	VPLD	Yes
Veolia Wschód Sp. z o.o. registered in Zamość, address: ul. Hrubieszowska 173, 22-400 Zamość, KRS: 0000049465	VWSCH	Yes
Veolia Zachód Sp. z o.o. registered in Wrocław, address: ul. Powstańców Śląskich 28/30, 53-333 Wrocław, KRS: 0000021724	VZACH	Yes
Veolia Szczytno Sp. z o.o. registered in Szczytno, address: ul. Solidarności 17, 12-100 Szczytno, KRS: 0000308650	VSZCZ	Yes

Update date: 2026-10-15

Fundacja Veolia Polska registered in Warsaw, address: ul. Puławska 2, 02-566 Warsaw, KRS: 0000567458	VFUN	Yes
Przedsiębiorstwo Wodociągów i Kanalizacji Sp. z o.o. registered in Tarnowskie Góry, address: ul. Opolska 51, 42-600 Tarnowskie Góry, KRS: 0000069696	PWIK	Yes
Veolia EKOZEC Sp. z o.o. registered in Poznań, address: ul. Energetyczna 7A, 61-017 Poznań, KRS: 0000043846	EKOZEC	Yes
Veolia Construction Poland Sp. z o. o.registered in Poznań, address: ul. Energetyczna 7A, 61-017 Poznań, KRS: 0000153715	VCOP	Yes
PEC Wągrowiec Sp. z o.o. registered in Wągrowiec, address: ul. Jeżyka 52, 62-100 Wągrowiec, KRS: 0000034074	VWAG	Yes
Veolia Energy Contracting Poland Sp. z o.o. registered in Warsaw, ul. Puławska 2, 02-566 Warsaw, KRS: 0000374958	VECP	Yes
Veolia Mała Kogeneracja Warszawa Sp. z o.o., ul. Stefana Batorego 2, 02-591 Warsaw, KRS 0000796617	VMKW	Yes

Update date: 2026-10-15

Veolia Mała Kogeneracja Warszawa 1 Sp. z o.o., ul. Stefana Batorego 2, 02-591 Warsaw, KRS 0001045921	VMKW 1	Yes
Veolia Mała Kogeneracja 1 Sp. z o.o., ul. Puławska 2, 02-566 Warsaw, KRS 0000949477	VMK1	Yes
Veolia Mała Kogeneracja 2 Sp. z o.o., ul. Puławska 2, 02-566 Warsaw, KRS 0001025934	VMK2	Yes
Veolia Mała Kogeneracja 3 Sp. z o.o., ul. Puławska 2, 02-566 Warsaw, KRS 0001039915	VMK 3	Yes
Veolia Small CHP 1 Sp. z o.o., ul. Puławska 2, 02-566 Warsaw, KRS 0001023722	VSCHP 1	Yes
Veolia Small CHP 2 Sp. z o.o., ul. Puławska 2, 02-566 Warsaw, KRS 0001026649	VSCHP 2	Yes
Veolia ESCO Polska Sp. z o. o., ul. Puławska 2, 02-566 Warsaw, KRS: 0000834391	VESCO	Yes
Veolia Woda Polska Sp. z o. o., ul. Puławska 2, 02-566 Warsaw, KRS: 0001105122	VWODA	Yes

3. Personal data is jointly controlled to the following extent:

Process name subject to joint control	Jointly determined purpose of processing within joint control	Categories of data subjects	Type of personal data subject to joint control	Jointly determined data retention period within joint control	Joint Controllers

Joint Control Process No. 1 - Employees and Collaborators	The process involves managing or supervising employees/collaborators at the group level, including support in employee assessment processes (e.g. to propose new positions, promotions and career paths within the group) and employee training; support in the internal recruitment process; administration of payroll and employee benefits managed at the group level, including employee shares, insurance; management of IT systems used to serve group employees and the internal network along with information security (applications, e-mail, portable storage media, computer network, internal network); organization and support in reorganization and restructuring processes conducted within the group, personal unions, successions; other processes managed at the group level, including for internal, administrative, statistical purposes, disputes, internal audit and control systems, as well as supervision over subsidiaries regarding employee matters.	Employees and collaborators	Personal data related to establishing, executing, and terminating an employment/collaboration relationship managed at the group level, including identification data (name, middle name, surname, changed surnames, PESEL), contact or address details (residential address, business address, phone number, e-mail address), data regarding education or professional qualifications (certificates, courses, professional development, education, knowledge of foreign languages, experience or areas of professional specialization, technical skills), employment history (positions, promotions, seniority, performance evaluation, recognitions and praises, disciplinary procedures and reprimands, employee references) or collaboration history (period, subject or area), data related to legal obligations, including labor law, tax law, financial settlements, social security or social protection (NIP, bank account number, place of birth, military service status, family status, competent tax office or ZUS, remuneration), termination of employment or collaboration (reason for termination, course of collaboration); data of the employee's children and other immediate family members, if providing such data is necessary due to the employee exercising special rights provided for in labor law; personal data of former employees, to the extent that applicable laws require data retention; data necessary to carry out tasks arising from the Act on the Company Social Benefits Fund, including identification data, content of applications or notifications and data contained therein (e.g. including earnings, family status, etc.)	10 years for employees hired since 2019-01-01 and 50 years for other employees, and in the remaining scope for a period of 3 years, unless specific provisions determine different data retention periods	VPOL with each of the Regional Companies individually

Joint Control Process No. 2 - Internal Communication / Expert Database	The process includes running and managing internal communication, organizing the expert database, and executing projects from the group level, including organizing contacts within group companies (intranet, common address book), organizing events or platforms for exchanging experiences and educational activities (newsletter, fairs, competitions, external training, internal or external training), identifying persons possessing specific or specialized competencies (expert database), executing projects from the group level within the framework of personal connections or joint ventures, including their organization and coordination (communication, reservation management). Excluding services provided between companies under separate contracts.	Employees and collaborators	Personal data related to communication, project execution, and education managed from the group level, including identification and contact details (name, surname, e-mail address, phone number), data regarding education or professional qualifications (certificates, courses, professional development, education, knowledge of foreign languages, experience or areas of professional specialization, technical skills), project experience within the Veolia group of companies, place of employment/collaboration, position, seniority, current involvement in educational, training or competition activities organized by group companies.	10 years from the end of the calendar year in which the employment relationship was terminated or expired, for employees hired since 2019-01-01 and 50 years for other employees, and in the remaining scope for a period of 3 years, unless specific provisions determine different data retention periods	Veolia Companies

Joint Control Process No. 3 - Recruitment	The process involves managing or supervising recruitment from the group level, including determining staffing/collaboration needs (analysis of current employment/collaboration structure), managing external recruitment systems or services (adding announcements, offers, defining job descriptions, requirements, qualifications, information clauses), managing internal IT systems in the field of recruitment and information security (internal network), verification of formal criteria of candidates, initial selection of candidates (compliance of application/CV with the position, competencies, education), managing and organizing the further recruitment process in a given group company.	Candidates for employment/candidates for collaboration	Personal data related to the recruitment process, including identification data (name, middle name, surname, changed surnames), contact or address details (residential address, business address, phone number, e-mail address), data regarding education or professional qualifications (certificates, courses, professional development, education, knowledge of foreign languages, experience or areas of professional specialization, technical skills), employment history (positions, promotions, seniority, performance evaluation, recognitions and praises, disciplinary procedures and reprimands, employee references) or collaboration history (period, subject or area).	The duration of the recruitment, and for a period of up to 3 years after the end of recruitment in the case of a legitimate interest regarding protection against claims related to recruitment)	VPOL with each of the Regional Companies individually

Joint Control Process No. 4 - Job Candidates Database	The process involves maintaining and managing a database of job candidates who submitted their candidatures unrelated to an ongoing recruitment or consented to the processing of their personal data for future recruitment purposes.	Job candidates	Personal data related to the recruitment process, including identification data (name, middle name, surname, changed surnames), contact or address details (residential address, business address, phone number, e-mail address), data regarding education or professional qualifications (certificates, courses, professional development, education, knowledge of foreign languages, experience or areas of professional specialization, technical skills), employment history (positions, promotions, seniority, performance evaluation, recognitions and praises, disciplinary procedures and reprimands, employee references) or collaboration history (period, subject or area).	A period of 12 months from the moment the application is submitted or until consent is withdrawn (whichever occurs earlier)	VPOL with each of the Regional Companies individually

Joint Control Process No. 5 - Compliance	The process involves managing or supervising compliance, quality, and compliance standards in the Veolia group of companies, including relations with suppliers (observing principles in the supply chain, regulatory compliance), mechanisms necessary to ensure compliance of actions by Veolia group companies with legal provisions, internal regulations, and ethical principles, compliance with regulations in the field of competition law, minimization of risks associated with the business activity of Veolia group companies, handling disputes, conducting internal audits and controls, ensuring the economic security of the Veolia group, internal compliance of the Veolia group.	Employees/collaborators of Veolia group companies in Poland, contractors, suppliers, guests.	Identification data (name, surname, position, place of employment, name of business activity conducted (company)), documentation of explanatory or supervisory proceedings.	Contact data will be deleted 1 year after the conclusion of the case proceedings, unless applicable legal provisions stipulate a longer retention period	Veolia Companies

Joint Control Process No. 6 - Customer Service	The process involves supervising Veolia Companies, conducting internal audits and controls, coordinating actions between Veolia Companies, ensuring business continuity for external clients, crisis management regarding customer service processes.	Clients of Veolia Companies with whom contracts for the provision of services have been concluded, including the sale of heat, other services or orders related to this, their representatives, board members, property administrators, tenants, persons reporting failures and contact persons	Personal data identifying the client, including name, surname, address of the registered office, residence or stay, PESEL, NIP, REGON, KRS, CEIDG), contact details, including phone number, fax number, e-mail address, data related to settlements, including bank account number (if using direct debit or electronic payment means), invoices, contracts, meters and readings, and other documents related to customer service, including applications, complaints, claims, balance information	The duration of the contract and for a period of 6 years from the end of the contract's performance	VPOL with each of the Regional Companies individually
Joint Control Process No. 7 - Inquiries and Correspondence Handling	The process involves managing and handling traditional and electronic correspondence: by e-mail, through contact forms, and also through the call center.	Persons directing inquiries, applications, or other submissions to Veolia group companies	Identification data, including: name, surname, residential address; contact details, including: e-mail address, phone number, fax number, correspondence address and the content of communication, including the content of the inquiry, application or other submission and the content of the response	As a rule, for 1 year from the receipt of correspondence, and for a period of 6 years if the correspondence concerns claims against the Veolia Company	Veolia Companies

Joint Control Process No. 8 - Suppliers and Contractors Database	The process involves managing and maintaining a database of cooperating or potential suppliers of services, equipment, and materials for the purpose of carrying out purchasing procedures aimed at finding and selecting optimal contractors and suppliers, including for sending requests for proposals, invitations to participate in proceedings, and for conducting the supplier selection process	Cooperating or potential suppliers or contractors and their representatives and contact persons	Identification data of suppliers and contractors, for natural persons: name, surname, residential or correspondence address, PESEL, REGON, ID card number and series, and in the case of a sole proprietorship additionally the name (company) and business address, contact details, including phone number, fax number, or e-mail address, identification and contact details of representatives and contact persons of suppliers and contractors, including phone number, fax number, e-mail address, and other data contained in offers or required for tender procedures, including price lists, certificates, information from CEIDG or KRK registers, information about the business activity of the supplier or contractor.	Personal data will be retained until such data ceases to be useful or until an effective objection is submitted. In the case of data of suppliers and contractors participating in the supplier or contractor selection process, data may be stored in accordance with internal purchasing procedures	Veolia Companies

Joint Control Process No. 9 - Insurance Handling	The process involves supervising or managing Veolia Companies in insurance handling regarding conducting claims settlement proceedings from natural persons, including participation in the proceedings at the stage of identifying damages, collecting, completing and transferring documentation and making decisions regarding reporting, liquidation, appeal, or other decisions related to conducting proceedings regarding damages, including decisions on the payment and amount of compensation or possible refusal of payment, and in the scope related to selecting or establishing insurance conditions for Veolia group companies, as well as contacting a broker, insurer, loss adjuster or other representatives of the parties in the claim liquidation proceedings to achieve the aforementioned purposes	Natural persons making a claim, proxies of parties in claims proceedings, representatives of insurers, loss adjusters, representatives of insurance brokers	Contact and identification data of persons participating in the insurance handling process, including name, surname, correspondence address, phone number, e-mail address, and additionally, regarding a person making a compensation claim, data regarding the damage or relevant to the proceedings, including information on the damage, correspondence conducted in the proceedings, damage documentation, decision of the pension authority; regarding other persons: place of work, position or function held, authorizations or competencies, other case documents.	For a period of 6 years from issuing a decision regarding the payment or refusal of compensation payment	VPOL with each of the Regional Companies individually

Joint Control Process No. 10 - Projects	The process entails carrying out joint projects by Veolia Group companies in the areas of: services, market research, or brand promotional activities, including the development, maintenance, or expansion of infrastructure/networks, the implementation of local initiatives, education, and brand promotion;human resources (HR) management, including internal internship or traineeship projects within Veolia Group companies for employees or contractors of other Veolia Group companies.	Employees, contractors of Veolia companies, external project participants, including individuals representing entities involved in the projects.	Data related to the specificity of a given project, including identification data, including name, surname, place of employment or represented entity; contact details, including e-mail address, phone number, fax number, residential address or correspondence address	For the duration of the project, and subsequently until the limitation of claims related to the project	Veolia group companies involved in a specific Project
Joint Control Process No. 11 - Journalists Database	The process involves managing and maintaining a database of journalists for the purpose of communicating information about Veolia Companies, including their activities or projects, as well as building reputation and media, promotional, business, and marketing relations	Journalists, editors, columnists, reporters of traditional and electronic media	Personal data in the form of name, surname, e-mail address, phone number or other information related to the place of employment/activity (e.g. name of newspaper, portal, as well as the job title of a given person)	Personal data will be retained until such data ceases to be useful or until an effective objection is submitted	Veolia Companies

Joint Control Process No. 12 - IT Systems Security	The process involves managing or supervising the ensuring of cybersecurity and crisis management of the Veolia group, including: monitoring the network activity of employees, business continuity management at the level of the Veolia group of companies in Poland, ensuring information security.	Employees/collaborators of Veolia group companies in Poland	Data contained in system logs, e-mail monitoring, and data regarding computer network monitoring	Personal data will be retained until such data ceases to be useful, unless applicable legal provisions determine a retention period	VPOL with each of the Regional Companies individually
Joint Control Process No. 12 - IT Systems Security	The process involves managing or supervising the ensuring of cybersecurity and crisis management of the Veolia group, including: monitoring the network activity of employees, business continuity management at the level of the Veolia group of companies in Poland, ensuring information security.	Employees/collaborators of Veolia group companies in Poland	Data contained in system logs, e-mail monitoring, and data regarding computer network monitoring	Personal data will be retained until such data ceases to be useful, unless applicable legal provisions determine a retention period	VPOL with each of the Regional Companies individually

Joint Controllership Process No. 13 – Health and Safety (H&S) Training for Visitors	The process entails managing and streamlining the Occupational Health and Safety (OHS / H&S) training process for visitors to Veolia Group companies' facilities via the Application. This includes verifying whether a visitor has completed the training and passed the H&S test, as well as maintaining a register of trained individuals to prevent the need for redundant, repeated H&S training for the same individuals.	Visitors (including, among others, contractors or employees of Veolia Group contractors)	First name and surname, Company name and Tax Identification Number (NIP) of the entity employing the visitor (or, where applicable, the business name and NIP of the sole proprietorship / business conducted by the visitor), Email address (optional – for dispatching the certificate), Information regarding the training format/source (completed independently / self-paced or via a member of the H&S department)	Data of individuals who have passed the test – until the expiration of the test validity period (3 years)	Veolia Companies

1. The essential content of the arrangements in the joint controller agreement can be found at: https://www.veolia.pl/polityka-prywatnosci.
2. The Data Protection Officer in the aforementioned entities is a person available at the following email address: inspektor.pl.vpol@veolia.com.
3. The processing of personal data is carried out in accordance with the rules set out in the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 (hereinafter: GDPR), the Act of 18 July 2002 on providing services by electronic means (Dz. U. 2002 No. 144 item 1204 as amended), the Act of 16 July 2004 Telecommunications Law (Dz. U. 2004 No. 171 item 1800 as amended), the Act of 10 April 1997 Energy Law (Dz. U. 1997 No. 54 item 348 as amended), the Act of 26 June 1974 Labor Code (Dz. U. 1974 No. 24 item 141 as amended), the Act of 11 March 2004 on Value Added Tax (Dz. U. 2004 No. 54 item 535 as amended), the Act of 29 September 1994 Accounting Act (Dz. U. 1994 No. 121 item 591), the Act of 15 September 2000 Commercial Companies Code (Dz. U. 2000 No. 94 item 1037 as amended), the Act of 29 January 2004 Public Procurement Law (Dz. U. 2004 No. 19 item 177 as amended), the Act of 7 July 1994 Construction Law (Dz. U. 1994 No. 89 item 414 as amended), Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

II. Legal bases for processing, requirement to provide personal data and recipients, transfer outside the EEA

1. The legal basis for processing personal data (GDPR) and the recipients for the individual processes managed by Veolia Energia Warszawa S.A. are:

Process	Legal basis for processing	Data recipients
Debt collection	Art. 6(1)(b), (c) and (f)	entities providing courier, postal, IT, legal services, Veolia group companies
Sales	Art. 6(1)(b) and (f)	entities providing courier, postal, IT, legal services, Veolia group companies including Veolia Energy Contracting Poland Sp. z o.o.
Marketing	Art. 6(1) (f)	entities providing courier, postal, IT, legal services, Veolia group companies including Veolia Energy Contracting Poland Sp. z o.o.
Shareholders	Art. 6(1)(c)	entities providing banking services, shareholders
Industry consultations (Applicants)	Art. 6(1)(b), (c), (d)	entities providing courier, postal services
Real estate management	Art. 6(1)(b) and (f)	couriers, Poczta Polska (Polish Post), entities cooperating with the Controller for the purposes of real estate management

Monitoring and security of facilities	Art. 6(1)(f)	security companies, companies providing handling and maintenance services for video monitoring equipment
Monitoring of company cars (GPS)	Art. 6(1)(f)	entities providing GPS services, Lessors, Municipal Police, Police, General Inspectorate of Road Transport (GITD), insurer, external law firm, post, couriers, insurance brokers, IT service providers.
Technical documentation	Art. 6(1)(c) and (f)	Contractors or Potential Contractors of designed construction works, Entities consulting on project documentation; personal data contained in technical projects may be published on the Internet.
External communication	Art. 6(1)(f)	entities providing courier, postal, legal, PR services
Whistleblowers	Art. 6(1)(c) and Art. 9(2)(g)	entities providing IT support services, Veolia Energia Polska S.A.
Recording of telephone conversations	Art. 6(1)(f)	system provider

Where personal data processing is based on Article 6(1)(c), the provision of personal data is mandatory and arises from legal provisions, whereas where personal data processing is based on another legal basis, the provision of personal data is voluntary. Refusal to voluntarily provide personal data may result in the inability to perform the activity specified in the process.

2. The legal basis for processing personal data (GDPR) and the recipients for the individual processes jointly controlled by Veolia Energia Warszawa S.A. are:

Process	Legal basis for processing	Data recipients
Joint Control Process No. 1 - Employees and Collaborators	Art. 6(1)(a), Art. 6(1)(b), Art. 6(1)(c), Art. 6(1)(f), Art. 9(2)(b)	contractors, entities providing courier, postal, IT, legal, digital signature services, Veolia group companies
Joint Control Process No. 2 - Internal Communication / Expert Database	Art. 6(1)(f)	entities providing courier, postal, IT, legal services, Veolia group companies
Joint Control Process No. 3 - Recruitment	Art. 6(1)(a), (b) and (f)	entities providing courier, postal, IT, legal services
Joint Control Process No. 4 - Job Candidates Database	Art. 6(1)(a)	entities providing courier, postal, IT, legal services
Joint Control Process No. 5 - Compliance	Art. 6(1)(c) and (f)	entities providing courier, postal, IT, legal services
Joint Control Process No. 6 - Customer Service	Art. 6(1)(b), (c) and (f)	couriers, Poczta Polska (Polish Post), entities cooperating with the Controller for the purposes of real estate management

Joint Control Process No. 7 - Inquiries and Correspondence Handling	Art. 6(1)(b), (c) and (f)	entities providing courier, postal, IT, legal services
Joint Control Process No. 8 - Suppliers and Contractors Database	Art. 6(1)(b), (c) and (f)	entities providing courier, postal, IT, legal services, Veolia group companies
Joint Control Process No. 9 - Insurance Handling	Art. 6(1)(c), (d) and Art. 9(2)(f)	brokers, insurers, entities performing postal, courier, accounting, legal, IT, banking services
Joint Control Process No. 10 - Projects	Art. 6(1)(f)	entities providing courier, postal, IT, legal services
Joint Control Process No. 11 - Journalists Database	Art. 6(1)(f)	entities providing courier, postal, IT, PR services
Joint Control Process No. 12 - IT Systems Security	Art. 6(1)(f)	entities providing IT, legal services
Joint Controllership Process No. 13 – Health and Safety (H&S) Training for Visitors	Art. 6(1)(f)	entities providing the following services: postal and courier, accounting, legal and advisory, IT, document destruction, and customer satisfaction surveys, as well as Veolia Group companies.

Joint Controllership Process No. 14 – Sector-Specific Marketing	Art. 6(1)(f)	providers of IT systems and IT services, service providers supplying technical, IT, and organizational solutions, providers of courier, postal, accounting, and document destruction services, legal and economic advisors, entities conducting customer satisfaction surveys, agencies providing market research, marketing, and advertising campaign services, as well as Veolia Group companies (in particular within the central database of business clients (B2B)).

Where personal data processing is based on Article 6(1)(c), the provision of personal data is mandatory and arises from legal provisions, whereas where personal data processing is based on another legal basis, the provision of personal data is voluntary. Refusal to voluntarily provide personal data may result in the inability to perform the activity specified in the process.

3. Personal data may be transferred to third countries (outside the European Economic Area), in particular in connection with the Controller's use of global IT solutions. Data may be transferred to third countries for which the European Commission has issued an adequacy decision. In the case of third countries for which such a decision has not been issued, data transfers may in each case be carried out using one of the safeguards aimed at ensuring an adequate level of data protection referred to in Chapter V of the GDPR. Information on the safeguards referred to in the preceding sentence can be obtained by contacting the Data Protection Officer using the contact details provided in point I section 4.

III. Rights of the data subject

1. Each data subject may exercise the following rights provided for in the GDPR:
    - **a) right of access** – to obtain confirmation from the controller as to whether or not personal data concerning them are being processed. Where personal data concerning a person is being processed, they are entitled to gain access to it and obtain the following information: the purposes of the processing, the categories of personal data concerned, information about the recipients or categories of recipient to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, or the criteria used to determine that period, the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing (Art. 15 GDPR);
    - **b) right to obtain a copy of the data** – to obtain a copy of the personal data undergoing processing, where the first copy is provided free of charge, and for any further copies requested, the controller may charge a reasonable fee based on administrative costs (Art. 15 sec. 3 GDPR);
    - **c) right to rectification** – to request the rectification of inaccurate personal data concerning them, or to have incomplete personal data completed (Art. 16 GDPR);
    - **d) right to erasure** – to request the erasure of personal data concerning them, if the controller no longer has a legal basis for processing it or the data is no longer necessary in relation to the purposes for which it was processed (Art. 17 GDPR);

- **e) right to restriction of processing** – to request the restriction of personal data processing (Art. 18 GDPR) when:
  - the accuracy of the personal data is contested by the data subject - for a period enabling the controller to verify the accuracy of the personal data;
  - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  - the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject;
- **f) right to data portability** – to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and to request transmission of those data to another controller, where the processing is based on the data subject's consent or on a contract and the processing is carried out by automated means (Art. 20 GDPR);
- **g) right to object** – to object to the processing of personal data concerning them based on the legitimate interests of the controller, on grounds relating to their particular situation, including profiling.