

PRIVACY POLICY FOR EMPLOYEES AND MEMBERS OF THEIR FAMILIES

1. Personal data protection under the Regulation on the Protection of Personal Data (RODO)

This privacy policy contains information about personal data collected by LANGE Robert Lange 00-062 Warsaw, Kredytowa street 2/72 as an administrator of personal data, this policy explains what is happening with this information and which in this regard are your rights. If you have any questions or comments, please email to **187reduta@gmail.com**.

For restaurant business, LANGE Robert Lange collects and uses information identifying individuals (also known as "personal data"), including information about our future, current and former employees and persons cooperating under civil law contracts, as well as about members of their families.

As part of personal data protection, we would like to inform you:

- why and how LANGE Robert Lange collects, uses and stores your personal data;
- on what legal basis this personal data is processed, and
- what are your rights and our responsibilities in relation to this processing.

2. What does the privacy policy cover?

This policy applies to all forms of use by us in Poland of personal data ("processing") concerning the personal data of people employed by LANGE Robert Lange, regardless of the basis of employment, as well as members of their families or others identified as being entitled to benefits through LANGE Robert Lange (together "Employees" or "Misters").

3. What kind of personal data do we collect?

3.1 Data of employees

3.1.1 Obligatory employee data

In the case of employees – in addition to the data obtained during the recruitment process described in the confidentiality policy for job applicants, we collect:

a) the data, the application of which is a mandatory requirement (in the case of workers employed on the basis of a labor contract), i.e.:

- PESEL number,
- other employee personal information and personal data about employees' children and other members of their immediate families, if necessary data through special rights of workers provided by labor laws (such as childcare or leave related to parenting)
- from 1 January 2019 – payment account number, if the Employee did not submit an application for payment of remuneration to his own hands,
- other personal data, if it is necessary to fulfill the employer's obligation established by law.

b) other information on employment, as well as taxes and social security contributions paid by the employer (including salary, bonuses, pension rights, insurance and other benefits, periods of employment / promotions / changes of position, work evaluation, information on occupied position, such as job title, information about attendance, including sick leave or vacation, the amount of taxes paid and social security contributions, information about military service, etc.),

c) details explicitly mentioned in the relevant personal questionnaire for the Employee,

d) personal data processed using corporate social media and similar tools functioning in LANGE Robert Lange and provided by employees using such tools.

In the case of employees who are not Polish citizens, we can collect data from documents confirming the identity - to the extent it is necessary to demonstrate compliance with the obligations arising from the Polish legislation regarding the relevant authorities responsible for immigration policy.

The consequence of failing to provide the above data (i) is the impossibility of continuing employment at LANGE Robert Lange or LANGE Robert Lange performing other employment related functions, such as the function of a tax payer and social security contributions, or (ii) providing the Employee with work tools such as company cars or corporate media social networking and other similar tools.

If we need to collect another your personal data necessary to fulfill our legal or regulatory obligations or to fulfill obligations arising from an agreement entered into between us (or necessary for such an agreement), we will inform you that the provision of this information is required and about the consequences we cannot download this information.

3.1.2 Precise information

Personal data processed by us may also include special, particularly detailed categories of data, such as health (including data on illness or work-related accidents, disability information, data contained in healthcare decisions on disability or membership data in trade unions),

We can also process employee violations:

- a) if it concerns transport offenses in cases where we receive such information from the competent authorities (see in detail in this regard in paragraph 3.1.3 below);
- b) if it concerns the Employer who committed the crime during the term of the employment contract, which makes it impossible to continue working in the position, if the crime is evident or confirmed by a final verdict.

Such categories of data will be especially protected by LANGE Robert Lange. In particular, such data will not be accessible to any third parties.

[3.1.x Staff Monitoring]

LANGE Robert Lange applies special surveillance in the workplace in the form of technical means for registration of images (monitoring). Monitoring is carried out using video surveillance cameras (CCTV cameras).

The monitoring does not include sanitary rooms, dressing rooms, dining rooms, smoking rooms or premises available to trade union organizations, if the use of monitoring in these premises is not necessary for monitoring purposes and does not violate the dignity and other personal rights of the employee, as well as the principles of the freedom and independence of trade unions.

3.1.3. Data collected from other sources

LANGE Robert Lange can also collect personal information about employees from other sources, not directly from the employees themselves. This applies to the following situations:

- a) collection of information from employees – data relating to family members or other persons entitled to the privileges specified in sections 3.1.1 and 3.1.2;
- b) data collection from the agency of temporary work – concerning personal data of temporary workers,
- c) collection of personal data of participants of competitions organized by McDonald's Poland Sp. o.o. who are employees of LANGE Robert Lange for the purpose of awarding prizes in such competitions – regarding personal data, including the results of the competition;
- d) collecting personal data of McDonald's users from McDonald's Poland Sp. o.o. who are employees of LANGE Robert Lange for the purpose of administering graphics on the Internet – regarding personal data covering working time;

e) collecting relevant information about an employee under the law from public authorities in cases where the provision of such information by LANGE Robert Lange is provided by law by the authorities;

e) collecting information about road violations while using an official vehicle from competent authorities such as the police or border service, or car dealers in the leasing business – in cases where LANGE Robert Lange is required to name the person who manages the vehicle.

4. On what legal basis and for what purposes we process personal data?

4.1. Legal basis for data processing

We cannot process personal data if we do not have a valid legal basis. Therefore, we process personal data only if:

(a) processing is necessary to fulfill contractual obligations towards you or, in accordance with your request, is necessary to take specific actions before entering into a contract, e.g. to pay remuneration;

b) processing is necessary in order to fulfill our legal obligations, such as submitting reports or information to relevant offices (e.g. the Social Insurance Institution) or explicitly requires us to do in accordance with the law (e.g. Article 221 of the Labor Code);

c) processing is necessary for the realization of reasonable interests of LANGE Robert Lange and does not unduly affect your interests or fundamental rights and freedoms. Please note that when processing personal data on this basis, we always strive to achieve a balance between our legitimate interests and your privacy;

d) in some cases, when we obtained your prior consent.

Such "legitimate interests" are:

a) improving the qualifications of employees through training;

b) offering our products and services to restaurant customers (among others, we can provide the customer, supplier or contractor with employee contact details of one of our employees, indicating that this person is a contact person within the LANGE Robert Lange organization)

c) prevention of fraud or criminal activity, misuse of our products or services, as well as care for the security of our IT systems;

d) meeting our corporate and social responsibility goals;

e) establishing or pursuing civil law claims by LANGE Robert Lange as part of its operations, as well as defending against such claims;

f) handling complaints from restaurant customers;

g) video monitoring of the restaurant premises in order to ensure the safety of employees, clients and other persons in the premises and property protection;

h) ensuring the organization of work enabling the full use of working time and proper use of work tools made available to the Employee by monitoring electronic mail or other forms of monitoring the employee's activity;

i) measures taken to maintain operational activities (e.g. employment planning, budget planning etc.)

4.2 Legal basis for the processing of precise data

Special categories of personal data (i.e. personal data revealing racial or ethnic origin, political views, religious or ideological beliefs, trade union membership, as well as genetic data, biometrics or health data, sexuality or sexual orientation) may be processed by LANGE Robert Lange only in special cases, i.e. when processing is necessary to fulfill our obligations resulting from employment, social security or social protection – this applies to personal data including:

- degree of disability and related special rights of employees,

- information included on the forms of dismissal from work and decisions of doctors performing occupational medicine activities,
- information on accidents at work and occupational diseases,
- information on belonging to a trade union in situations where certain rights or special protection of an employee depends (e.g. protection against termination of employment).

LANGE Robert Lange may also process data regarding the violation of the law by employees, if it is necessary to fulfill the obligation to indicate the person driving the vehicle or if it concerns the Employer committing a crime during the employment contract, which makes it impossible to continue employment at the post, when the offense is obvious or has been confirmed by a valid judgment.

4.3 Consent to data processing

If we process your personal data based on your consent, it may be revoked at any time as easily as it has been granted. Failure to consent to the processing of data to which you are not obliged to provide will not result in the termination of the employment relationship with the Employee, and its cancellation will not result in adverse consequences for the Employee.

4.4. The purpose of data processing

We always process your personal data for a specific purpose and process only personal data that is necessary to achieve it. In particular, we process employees' personal data for the purposes of:

- administration and management of our personnel (including management of tasks, absences, time records and planning of personnel changes);
- enabling employees to use additional services or tools provided by LANGE Robert Lange or cooperating entities;
- performing tasks under concluded agreements;
- training of our employees;
- management of our employee documentation, including, in particular, employees' personal files;
- calculation of remuneration and bonuses;
- issuing prizes in competitions organized by McDonald's Polska sp. o.o.;
- monitoring the activities of our employees in the workplace, including compliance with the rules and applicable health and safety regulations;
- directing employees to obligatory medical examinations;
- management of our IT resources;
- management of all disciplinary activities;
- providing answers to the requests of public or judicial authorities (e.g. the Police or authorities responsible for immigration policy) or requests of such authorities;
- compliance with all legal obligations imposed on LANGE Robert Lange in relation to Employees.

5. How do we protect your personal data?

All employees accessing personal data, in particular managers and restaurant managers, must follow internal rules and processes related to the processing of personal data in order to protect them and ensure confidentiality. They are also required to comply with all technical and organizational security measures put in place to protect personal data.

We have implemented appropriate technical and organizational measures to protect employees' personal data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access, and against all other illegal forms of processing. These security

measures have been implemented taking into account the state of the art, implementation costs, processing risks and the nature of personal data, with particular emphasis on sensitive data.

6. Who has access to personal data and to whom are they transferred?

6.1. As part of McDonald's

We may transfer personal data to our employees as well as to other Franchisees and to McDonald's Polska sp. o.o. with headquarters in Warsaw (including "McDonald's"). This applies to the following situations:

a) sharing personal data of LANGE employees Robert Lange McDonald's Polska sp. o.o. for the purposes of the inspection of the legality of employment at LANGE Robert Lange – regarding personal data processed by LANGE Robert Lange in connection with employment of employees;

b) sharing personal data of LANGE employees Robert Lange McDonald's Polska sp. o.o. for the purpose of conducting employee training by this entity – regarding personal data identifying employees;

c) sharing personal data of LANGE employees Robert Lange McDonald's Polska sp. o.o. and other entities owned by McDonald's and suppliers of services to these entities for the purposes of corporate social media and similar tools – regarding personal data of employees processed by LANGE Robert Lange and provided by employees with such tools;

d) making the employees' personal data available to other Franchisees in the event of temporary employment by such an employee for another Franchisee.

In these situations, McDonald's entities are independent data administrators, which means that LANGE Robert Lange has no control over how and in what extent they process your personal information. LANGE Robert Lange is not responsible for compliance of such entities with regulations.

6.2. Beyond McDonald's

We may also transfer personal data to recipients and other third parties outside of McDonald's in order to fulfill the objectives set out in section 4.4 to the extent that they are necessary for them to carry out the tasks assigned to us, if it is required by law or if we have another legal basis (e.g. you have given consent to the transfer of data). The recipients or other third parties may be considered:

a) entities processing personal data on behalf of LANGE Robert Lange, such as:

- our IT systems providers and hosting services,
- entities providing HR and payroll services,
- entities providing accounting services,
- entities providing document archiving services.

Such entities do not decide by themselves how to process your personal data. The processing of personal data takes place only to the extent that it is necessary for LANGE Robert Lange to do business. LANGE Robert Lange has control over the operation of such entities by means of appropriate contractual provisions protecting your privacy.

b) entities such as:

- temporary work agencies (regarding personal data of temporary employees),
- entities controlling access to restaurant premises (e.g. building administrators in which the premises are located) or entities providing security services,
- legal or tax advisors,
- car fleet management entities,

- courier or postal service providers,
- LANGE Robert Lange's business partners, suppliers or contractors (for employees who act as a representative or contact person within LANGE Robert Lange),
- entities providing services to employees (benefits, medical care, training, etc.).

Such entities are independent data controllers, which means LANGE Robert Lange has no control over how and in what extent they process your personal data. LANGE Robert Lange is not responsible for compliance of such entities with regulations.

c) all national public administration bodies, bodies of other Member States of the European Union (e.g. bodies appointed to protect personal data in other Member States of the EU) or courts, if required by applicable national or Union law or at their request.

6.3. Data transfer outside the European Economic Area

Personal data transmitted within or outside of McDonald's may also be processed in a country outside the European Economic Area (EEA), which includes Member States of the EU, Iceland, Liechtenstein and Norway. Countries outside the EEA may not offer the same level of protection of personal data as EEA countries.

If your personal data is transferred outside the EEA, LANGE Robert Lange will provide appropriate safeguards to ensure that such transfers are carried out in accordance with the applicable data protection rules. To ensure an adequate level of protection of personal data, LANGE Robert Lange may, for example, use the contract to entrust processing with a third party recipient based on standard contractual clauses approved by the European Commission or ensure that the transfer will take place within the jurisdiction of the European Commission's decision on the adequate protection of personal data. You can also ask for additional information in this regard and obtain a copy of the relevant security, using your rights set out in point 8.

7. How long do we keep your data?

We only store personal data for as long as necessary to achieve the purpose for which it was collected or to comply with legal requirements.

The personal data of employees are processed:

a) in the scope of data stored in personal files – for the entire period of employment, and after that time – for 50 years after the end of employment (from 1 January 2019 this period may, change to 10 years in connection with the amendment of the law);

b) in the scope of other data – for the period of employment or the use of additional benefits or tools, and after that time:

i. for the period of limitation of civil claims in order to allow LANGE Robert Lange to investigate possible claims or defend against such claims; as a rule, it is up to 3 years for employee claims and up to 10 years for claims of persons employed on the basis of civil law contracts or claims in relation to such persons) and

ii. for periods required by law, in particular by tax regulations - during periods of limitation of tax liabilities - or accounting regulations; in most cases, these are five-year periods.

However, if you wish to have your personal data removed from our databases, you can submit an application in accordance with the information contained in point 8, which we will consider in a manner specified therein.

8. What are your rights and how you can use them?

8.1. Existing rights

You have the right to access your personal data processed by LANGE Robert Lange. If you believe that any information about you is incorrect or incomplete, you also have the right to

apply for rectification in the manner specified in section 8.2. below. LANGE Robert Lange will promptly correct such information.

You also have the right to:

- a) withdraw your consent in the event that LANGE Robert Lange obtained such consent for the processing of personal data (provided that such withdrawal does not violate the law of data processing carried out prior to the withdrawal);
- b) request removal of your personal data;
- c) request to limit the processing of your personal data;
- d) object to the processing of your personal data for other purposes if LANGE Robert Lange processes this data on a different legal basis than your consent; or
- e) transfer of data, i.e. receipt of personal data transferred to LANGE Robert Lange in a structured, commonly used and readable machine format, and to request such personal data to be transferred to another controller of personal data, without inconvenience from LANGE Robert Lange and subject to its own obligations regarding confidentiality.

LANGE Robert Lange will verify your requests, demands or objections in accordance with the applicable provisions on the protection of personal data. However, remember that these rights are not absolute; provisions provide for exceptions to their application.

8.2. Using your rights

You can take advantage of the above rights:

- through your immediate superior (e.g., the chief or manager of the restaurant);
- by contacting LANGE Robert Lange at 02-459 Warsaw, Górczewska street, 249, by sending an e-mail to 187reduta@gmail.com or by calling 664353195.

If you are not satisfied with the way in which LANGE Robert Lange processes your personal data, please let us know about the problem and we will investigate any irregularities that have occurred. Please report your doubts with the methods indicated above.

If you have reservations about the LANGE response of Robert Lange, there is also the possibility of submitting a complaint to the competent authority for the protection of personal data. In Poland, this body is the President of the Office for Personal Data Protection.

In order to ensure the accuracy and accuracy of personal data, we may periodically ask you to check and confirm personal data that we hold about you or inform us about any changes to these personal data (such as change of address or change of marital status). We encourage Employees to regularly check the correctness, timeliness and completeness of the personal data being processed.

9. Updates to the privacy policy

This policy has been updated on 25/05/2018 and may be subject to further changes. If required by law, all information regarding future changes or additions to the processing of personal data described in this policy, which may affect you personally, will be communicated to you through the appropriate form of communication usually used at LANGE Robert Lange.

Employee's statement

I hereby declare that:

- a) I have read the employee privacy policy;
- b) I have received a copy of the privacy policy;
- c) I undertake to immediately make a copy of the privacy policy available to all persons to whom I transfer data to LANGE Robert Lange based on the provisions of this policy.

[date and signature (name and surname)]