

Information on the General Data Protection Regulation (GDPR) for users of the WH Okna software and dealer versions of the WH Okna software as manufactured by Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k.

What is GDPR?

GDPR means legal regulations concerning the protection of personal data, in particular:

- ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on personal data protection which came into force in the European Union on 25 May 2018,
- ✓ Polish Act of 10 May 2018 on personal data protection which entered into force on 25 May 2018.

What is personal data?

Personal data shall mean any and all information allowing for the identification of a given person in a direct or indirect manner. Personal data include i.a. name and surname, PESEL number, NIP [tax identification number], e-mail address, telephone number.

The GDPR protects the personal data of natural persons, i.e. all persons (people), regardless of whether they are consumers or entrepreneurs.

What is the processing of personal data?

Processing of personal data is any operation relating to personal data, for example: modification, collection, downloading, reviewing, use, transmission, distribution, sharing, deletion or destruction of personal data.

What rights do you have under the GDPR?

A person whose personal data is processed has a number of rights under the law. These include: the right to be informed about the scope and purpose of data processing, the right to rectification or the right to erasure, the right to be forgotten.

In order to exercise your rights related to the protection of personal data, you should contact the Personal Data Controller.

Is Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k. the controller of the data that is entered into the WH Okna system?

Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k. is not the Controller of the Personal Data entered into the WH Okna system but may be the entity processing the data (processor).

Is the data entered into the system secure and processed in accordance with the GDPR?

The data entered into the system is safely stored on servers belonging to Amazon, located within the European Economic Area, and on servers belonging to Microsoft.

The employees of Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k. may have access to personal data entered into the system only for the purpose of handling the IT service of the system. In this case, the employees are authorised to process the relevant personal data and are obliged to maintain the confidentiality of the personal data to which they have access.

In order to increase the security of personal data processing in the WH Okna software:

- ✓ Use a secure password - one that contains lower and upper case letters and digits.
- ✓ Do not share your password with anyone or save or disclose it.
- ✓ Change your password regularly.
- ✓ Use only trusted computers, external storage devices and mobile devices.
- ✓ When you have finished your work in the system, remember to log out of the system.

Technical information on the processing of personal data - WH Okna software

1. Any and all data is processed on the customer's local computers in MS SQL databases.
2. At the request of the manufacturer, personal data, including customer data, may be transferred to Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k.
3. The access to the WH Okna and WH Bazy software is restricted by the login procedure with an individual user password. Logged-in users have access to data, including personal data, depending on their rights or authorizations.
4. Personal data of customers and dealers is saved in the following tables:
 - ✓ dbo.klienci,
 - ✓ dbo.rep.odbiorca,
 - ✓ dbo.dealerzy.
5. No tables with personal data are stored in *.ar3 technological archives.
6. *.ofr and *.zlc document files may include encrypted personal data (if the user preparing these documents provided such data).

Technical information on the processing of personal data - WH Okna software dealer version (classic)

1. The WH Okna software dealer version is installed locally at the dealer's premises.
2. Any and all data is processed on the local computers in MS SQL databases.
3. No data, including customer personal data of the customers, is transferred to Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k.
4. Access to the WH Okna software dealer version is restricted by the login procedure with an individual user password. Logged-in users have access to data, including personal data, depending on their rights or authorizations.
5. Personal data of customers and dealers is saved in the following tables:
 - ✓ dbo.klienci,
 - ✓ dbo.rep.odbiorca.
6. *.ofr and *.zlc document files may include encrypted personal data (if the user preparing these documents provided such data).

Technical information on the processing of personal data - WH Okna Cloud software (in the cloud)

1. The WH Okna Cloud software is installed in the Amazon cloud.
2. The Service Provider, Amazon is based in the US and has an EU-US-Privacy Shield. The current certificate is available at: <https://www.privacyshield.gov/list>. Under the agreement between the US and the European Commission, the latter has established an adequate level of data protection for companies holding a Privacy Shield certificate.
3. Any and all data is processed in the Amazon cloud.
4. The cloud computing controller that runs the WH Okna Cloud software is Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k., which rents the service from Amazon.
5. Cloud computing facility via which the WH Okna Cloud data is processed is located in the EU.
6. No data, including customer personal data of the customers, is transferred to Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k.
7. Access to the WH Okna software dealer version is restricted by the login procedure with an individual user password. Logged-in users have access to data, including personal data, depending on their rights or authorizations.
8. Personal data of customers and dealers is saved in the following tables (these tables are in the cloud):
 - ✓ dbo.klienci,
 - ✓ dbo.rep.odbiorca.
9. *.ofr and *.zlc document files may include encrypted personal data (if the user preparing these documents provided such data).

Technical information on the processing of personal data - WH Okna data exchange server (communications server)

1. WH Okna data exchange server is located in the Microsoft cloud.
2. The Service Provider, Microsoft is based in the US and has an EU-US-Privacy Shield. The current certificate is available at: <https://www.privacyshield.gov/list>. Under the agreement between the US and the European Commission, the latter has established an adequate level of data protection for companies holding a Privacy Shield certificate.
3. Any and all data is processed in the Microsoft cloud.
4. The cloud computing controller that runs the WH Okna Cloud data exchange server is Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k., which rents the service from Amazon.
5. The data exchange server can only be accessed by authorized IT staff of Winkhaus Polska Beteiligungs spółka z ograniczoną odpowiedzialnością sp.k.
6. The databases used by the WH Okna data exchange server contain the following data:
 - A. Data used to identify business partners (manufacturer - dealer) in order to ensure proper communication and transmission of documents. This is the following data:

dbo.adresaci table:

 - ✓ NIP [Tax Identification Number] (user ID, any unique character string),
 - ✓ Name (descriptive field, dealer name),
 - ✓ Update, Update1, Update2, Update3 fields (database identifiers),
 - ✓ User_no (the user number assigned when registering the WH Okna software),

- ✓ User_info1, User_info2, User_info3, User_info4 fields (descriptive fields sent from the manufacturer to the dealer, usually this is the data that appears on report headers and describe, for example, the address data of the dealer's office),
- ✓ Expiry (expiry date of the dealer database).

dbo.zlecenia table:

- ✓ Manufacturer's and dealer's NIP [Tax Identification Number] (user IDs, any unique character string),
- ✓ Name containing the ZOD code (unique number of the manufacturer-dealer communication document),
- ✓ The Data field (contains binary, coded data in which the document is stored: inquiry or production order. This data may include personal data of customers, if the dealer has entered it, of course.) The WH Okna data exchange service does not analyse this data in any way.

B. The data of the processed documents is not stored by the WH Okna communications server.

Our contact details and your rights

You are entitled to free information about the processing of your personal data that is stored with us. Should you have any questions, please contact our data protection officer:

Marzena Jakimowicz

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Questions, comments, remarks or doubts concerning the functioning of the WH Okna dealer version, WH Okna Cloud or communications server should be directed through our field IT specialists or Helpdesk employees:

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Best regards,

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