

## PRIVACY NOTICE

for employees

### 1. Name and contact details of personal data Controller:

Pratt & Whitney Kalisz Sp. z o. o. based in Kalisz, ul. Elektryczna 4A (hereinafter "Company"),  
email: [daneosobowepwk@prattwhitney.com](mailto:daneosobowepwk@prattwhitney.com)

### 2. Purpose and legal basis for personal data processing:

**2.1** Your personal data will be processed in order to perform your contract of employment including fulfilment of the obligations set out by applicable laws or the company's Working Regulations, management, work planning and organization, diversity and inclusion at work, health and safety at work, protection of employer's or customer's property and for purposes of individual or collective exercise of rights and employment benefits including termination of employment. Providing personal data is optional, however, failure to provide it (except for personal data processed under your consent) renders conclusion of the contract of employment impossible. Your business contract information will be processed to support business operations of the Company, including for the purpose of fulfilment legal obligations connected with the operations, as well as for the purpose of communication with clients, vendors, business partners and governmental agencies officials.

**2.2** The legal basis for processing your personal data includes:

- a) conclusion and execution of your employment contract (article 6 point 1b of the Regulation 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, hereinafter "GDPR"), as well as fulfilment of Company's legal obligations connected with the employment contract (art. 6 point 1c of the GDPR and art. 9 point 2b of the GDPR in respect of processing personal data related to your health);
- b) fulfilment of Company's legal obligations connected with the Employee Retirement Program created and operated by the Company, if an employee decided to participate in the program (art. 6 point 1c of the GDPR)
- c) fulfilment of Company's legal obligations connected with business operations of the Company (art. 6 point 1c of the GDPR)
- d) business activities of the Company and ensuring communication with clients, vendors and business partners for the purpose of, among others, quotation, making and executing orders, concluding and executing contracts, which constitutes a legitimate interest of the Company (art. 6 point 1f of the GDPR);
- e) fulfilment of Company's legal obligations specific for military production requiring provision of citizenship details, which constitutes a legitimate interest of the Company (art. 6 point 1f of the GDPR);
- f) fulfilment of Company's legal obligations which stem from the Labour code and which concern obligatory medical examinations of the employees, the fulfilment of the obligation is supported by a toll allowing creation of electronic medical referrals for employees which requires processing of employees' email address and telephone number, including private telephone number in case of lack of business telephone number, the processing constitutes a legitimate interest of the Company (art. 6 point 1f of the GDPR);
- g) assessing, pursuing or defending claims between you and the Company, as well as use of visual monitoring, speed monitoring within the Company premises, which constitutes

- Company's legitimate interests - ensuring security for the Company itself, Company's personnel and customers ( Article 6 point 1f of the GDPR);
- h) ensuring that individuals indicated by you are informed about your emergency situations which constitutes legitimate interest of yours as well as of the Company (article 6 point 1f of the GDPR).
  - i) voluntary consent, provided it is granted under GDPR terms (article 6 point 1a and article 7 of the GDPR) and the Labor Code. The consent for processing personal data to the above extent is optional and may not be a basis of your unfavorable treatment while failure to express such consent may not cause any negative consequences for you, especially it may not be used to justify refusal to hire, cancel the contract of employment or terminate it without notice by the Company;
  - j) fulfillment of Company's legal obligation to measure and monitoring Xrays radiation to which employees are exposed in connection with their work (based on art. 6 point 1c of the GDPR in connection with the provisions of legal act dated 29<sup>th</sup> of November 2000 - the Nuclear Law and implementing acts)
  - k) fulfillment of Company's legal obligations connected with remote work, including obligation to facilitate, evidence and control remote work for their employees (based on art. 6 point 1c and art. 9 point 2b of the GDPR in connection with the provisions of legal act dated 26<sup>th</sup> of June 1974 – Labour Code and other implementing acts).

### **3. Recipients of personal data**

Your personal data may be shared with third party companies such as those:

- a) providing private healthcare services, if you give your consent to that;
- b) providing labor healthcare services (initial and periodic examination);
- c) offering employee benefits, such as access to sport and leisure centers ("cafeteria plans");
- d) providing IT, HR, counselling, accounting, transportation, delivery, mail, maintenance, agency, training, security and audit services to the Company;
- e) Company's clients and suppliers within the scope of your employment duties, for example your business contact information;
- f) divisions of Raytheon Technologies Corporation, which constitutes legitimate interest of the Company and those divisions as members of a capital group (article 6 point 1f of the GDPR).

### **4. Territorial scope of processing personal data:**

Your personal data will be processed by the Company within the European Economic Area ("EEA") as well as it may be transferred to:

- a) Canada pursuant to the Commission Decision of 20 December 2001 on the adequate protection of personal data provided by the Canadian Personal Information Protection and Electronic Documents Act.
- b) the USA based on Binding Corporate Rules as well as other security measures provided for by article 46-49 of the GDPR.

Electronic transfer of personal data beyond the European Economic Area is protected inside a private, corporate and encoded IT network of Raytheon Technologies Corporation.

### **5. Retention period for personal data:**

Your personal data will be stored for as long as necessary to perform the contract of employment and thereafter for as long as adequate for limitation of claims. The company may store your personal data longer than stated in the preceding sentence only when such obligation is imposed upon the Company

by applicable laws such as regulations governing periods of obligatory storage of employee documentation.

For personal data collected in connection with monitoring, its retention period does not exceed three months, unless such data constitutes evidence in proceedings conducted in accordance with law provisions, or if the Company have reasons to believe that it may constitute evidence in such proceeding – in those cases the data can be stored until the proceedings are ended with a final decision.

## **6. Your rights:**

To the extent specified by the law you are entitled to:

- a) access your personal data,
- b) have your personal data adjusted,
- c) have your personal data removed,
- d) limit processing of your personal data,
- e) have your personal data transferred, if the Company processes the data based on a contract executed with you or based on your consent,
- f) file an objection to processing of your personal data when the Company processes the data for its legitimate interest,
- g) revoke, at any time, consent for processing of your personal data without affecting legitimacy of processing performed before such revoking, provided the Company processes it based on your consent.

The above rights may be exercised by sending your claims to

[daneosobowepwk@prattwhitney.com](mailto:daneosobowepwk@prattwhitney.com)

You are entitled to make a complaint to the President of the Office for Personal Data Protection when you establish that processing of your personal data by the Company violates applicable law provisions.

**If you want to find out more on global privacy policy of Raytheon Technologies Corporation, the owner of the Company, which serves as a guidance for collection, processing, transfer and protection of personal data of employees, job applicants, clients and suppliers, their employees and representatives, visitors, you can find it at <https://www.rtx.com/privacy>.**