

## **PROCEDURE FOR THE PROTECTION OF PERSONAL DATA WHEN WORKING REMOTELY**

### **I. INTRODUCTION**

1. This Procedure for the protection of personal data during remote work (hereinafter referred to as the "Procedure") is in force at Loyalty Partner Polska Sp. z o.o. with its seat in Warsaw (hereinafter referred to as the "Employer").
2. The Procedure defines the principles of personal data protection for all employees employed by the Employer (hereinafter collectively referred to as the "Employees" and individually as the "Employee") who perform remote work in accordance with the Employer's Remote Work Regulations.
3. The Employee confirms that he/she is familiar with this Procedure, including that he/she undertakes to comply with the Procedure.
4. The Employer shall - as necessary - conduct instruction and training in terms of data protection. Determination of the need for instruction and training and the rules of instruction and training will be determined separately.
5. Each Employee, while performing remote work, shall be obliged to process personal data in accordance with this Procedure, the provisions of law, including in particular the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons in relation to the processing of personal data and on the free flow of such data and the repeal of Directive 95/46/EC (General Data Protection Regulation) (the "GDPR"), and the documentation governing the Employer's data processing rules.

### **II. Personal data security principles**

Each Employee, when performing remote work, shall ensure the security of personal data, i.e.:

- 1.1. process personal data lawfully and exclusively for business purposes;
- 1.2. ensure that unauthorized persons do not have access to personal data;
- 1.3. protect personal data from loss, destruction or damage.

### **III. The Employee's duties while performing of remote work**

1. The Employee, in the course of performing remote work, is obliged to apply the Procedure accordingly: "Security Rules at Loyalty Partner Poland", in particular to the extent that this Procedure does not regulate otherwise.
2. Third parties, including persons residing with the Employee shall not have the right to access documents owned by the Employer and work tools provided to the Employee to perform remote work.
3. It is prohibited for the Employee to perform remote work in public places (e.g., cafeteria, restaurant, public transportation).
4. The Employee is obliged to lock the monitor each time he/she leaves the room where he/she performs remote work.

5. The Employee is obliged to use an appropriate screen masking filter for the monitor screen (especially during business travel).
6. Printing of documents owned by the Employer in the place where remote work is performed is prohibited unless the Employee has obtained permission from the supervisor.
7. The Employee who wants to take documents owned by the Employer from the Employer's premises to the remote work site shall secure them during transportation to the remote work site. When the documents are no longer necessary for the performance of work, the Employee shall bring these documents to the Employer's premises and dispose of them.
8. The Employee is obliged to immediately report irregularities related to the functioning of work tools, the need to update antivirus software or system software updates, etc. to the Office IT/Helpdesk for further procedure.
9. The Employee shall immediately report a data protection breach (including theft or loss of work tools, documents or mistakenly sending email correspondence to inappropriate persons). Notification of a data protection breach should be sent to the DPO and Incident Management Team Notification to: [mojedane@payback.net](mailto:mojedane@payback.net) or LPP Incident Management [Team@payback.net](mailto:Team@payback.net) according to: „Security Rules at Loyalty Partner Poland”.

#### **IV. Final provisions**

1. The procedure shall enter into force on 07.04.2023.
2. Subject to law, the Employer shall have the right to amend the provisions of this Procedure.