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REQUIREMENTS IN THE SCOPE  
OF INFORMATION SECURITY  
for CONTRACTORS  
of Protea Sp. z o.o. in Gdansk

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§ 1.

Requirements in the scope of information security

for contractors of Protea Sp. z o.o. in Gdańsk, constitute a document whose aim is to obtain an optimal and compliant with the requirements of applicable legal acts standard of information processing entrusted to contractors in connection with the implementation of contracts.

This document has been submitted by the Order of the President of the Management Board and is made available to every contractor.

§ 2.

Expectations in the scope of information security

for contractors of Protea Sp. z o.o. in Gdańsk were developed based on:

1. The Act of August 29, 1997 about the personal data protection (Journal of Laws of 2016, item 922) (uodo);
2. Decree of the Minister of Internal Affairs and Administration of 29 April 2004 on the documentation of personal data processing and technical and organizational conditions which should be met by devices and IT systems used to process personal data (Journal of Laws No. 100, item 1024) ;
3. Regulation of the Minister of Administration and Digitization of December 10, 2014 concerning the templates for notifications of appointment and dismissal of the information security administrator (Journal of Laws, item 1934);
4. Regulation of the Minister of Administration and Digitization of May 11, 2015 on the mode and manner of performing tasks in order to ensure compliance with the provisions on the protection of personal data by the information security administrator (Journal of Laws, item 745);
5. Regulation of the Minister of Administration and Digitization of May 11, 2015 on the manner in which the data security administrator conducts information on the register of data files (Journal of Laws, item 719);
6. Regulation of the Council of Ministers of 12 April 2012 on the National Interoperability Framework, minimum requirements for public registers and information exchange in electronic form and minimum requirements for ICT systems (Journal of Laws of 2016, item 113);
7. Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (GDPR - General Data Protection Regulation) (Dz. Urz.UE L119 from 4 May 2016).

§ 3.

Whenever this document refers to:

1. Personal Data Administrator (PDA) - it should be understood as an authority, organizational unit, entity or person deciding about the purposes and means of processing personal data (of the contractor);
2. A person designated by PDA to perform tasks related to the protection of personal data - it should be understood as a natural person appointed by the Personal Data Administrator, responsible for ensuring compliance with the provisions about personal data protection and keeping the required documentation by the administrator;
3. IT specialist - it should be understood as a natural person designated by PDA who is responsible for organizational, physical and technical security of personal data processed in the IT system;
4. Contractor - should be understood as a contractor of Protea Sp. z o.o. as the Personal Data Administrator;
5. Personal data - it shall mean all information regarding an identified or identifiable natural person;
6. POPDP - should be understood as the President of the Office for Personal Data Protection;
7. ITSI / Instruction - this should be understood as a document valid for the contractor called the IT SYSTEM MANAGEMENT INSTRUCTION for processing personal data;
8. Data carriers - it should be understood as physical objects (electronic, paper) on which it is possible to save information for storage, processing and transmission;
9. Recipients of data - shall mean anyone to whom personal data is provided, with the exception of authorities and persons who are authorized to process personal data on the basis of applicable law;
10. ISP / Policy - it should be understood as a document valid for the contractor called Information Security Policy;
11. Employee - it should be understood as a natural person providing work or performing activities based on other contracts in / for the benefit of the contractor;
12. Data processing - shall mean all operations performed on personal data, such as collection, recording, storage, development, modification, sharing and deletion, in particular those operations that are performed in the IT system;
13. IT system (IT system) - it should be understood as a team of devices, programs and information processing procedures cooperating with one another and software tools used by the contractor to process personal data;

14 .User - should be understood as a person who obtained authorization from the contractor to process personal data in the IT system and signed a statement of confidentiality obliging it to keep in the secret of processed data;

§ 4.

Requirements in the scope of information security for contractors of Protea Sp. z o.o. in Gdańsk, define the criteria for providing contractors with information containing personal data, necessary organizational and technical measures to ensure protection of these data, rules of conduct in the event of a breach of security and the consequences of breach of provisions on personal data protection by contractors, their employees and other persons authorized by contractors to process this data.

§ 5.

Keeping information security, including in particular the security of personal data processed by the contractor is understood as ensuring their confidentiality, integrity, accountability and availability at the level required by law.

§ 6.

The measure of security is the amount of risk associated with the protection of personal data. Risk management is understood as the process of identifying, monitoring and minimizing or eliminating the risks that may apply to IT systems and traditional services used to process personal data.

§ 7.

The contractor, as the Personal Data Administrator, performs a control function in the scope of the correct processing of personal data and is responsible for providing organizational and technical means to keep the security level of the data, in accordance with the requirements set out in the law.

§ 8.

The contractor, as the Personal Data Administrator, is obliged to keep current and legally compliant documentation in the form of Information Security Policy and the Instruction for managing the IT system used to process personal data and other documentation required by the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April

2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC.

### § 9.

The Contractor, as the Personal Data Administrator, is obliged to disclose to Protea Sp. z o.o. in Gdańsk, the rules applicable to him in the scope of:

- 1) fulfilling the information obligation resulting from the provisions of law,
- 2) applied technical and organizational measures to maintain special diligence in the processing of personal data,
- 3) the possibility of updating processed personal data, temporary or permanent suspension of data processing or their removal from the file, when requested by the person whose data is processed,
- 4) sending and canceling authorizations to process personal data and compliance of applicable authorizations with the requirements set out in legal provisions,
- 5) recording persons authorized to process personal data (list of persons authorized to process personal data),
- 6) oblige the authorized persons to process personal data to keep them secret, specifying the period of validity of this obligation (confidentiality statement),
- 7) controlling the provision and entrustment of personal data and keeping the documentation required by law in this regard,

### § 10.

The Contractor, as the Personal Data Administrator, is obliged to inform Protea Sp. z o.o. about whether it is obligatory in their case to appoint the Inspector of Personal Data Protection referred to in art. 37 paragraph 1 of the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free shifting of such data and the repeal of Directive 95/46 / EC. If they do not recognize such an obligation, they are obliged to inform Protea Sp. z o.o. about the fact who in his case is responsible for the performance of duties in the field of personal data protection.

### § 11.

The contractor, as the Personal Data Administrator, is required to specify in the information security documentation of the competence of the Person designated by the PDA to perform tasks related to the protection of personal data, in accordance with the provisions of Regulation of the European Parliament and of the Council (EU) 2016/679 of 27

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April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC.

§ 12.

The Contractor, as the Personal Data Administrator, is obliged to develop the rules for the protection of personal data used by the Data Administrator and to request Protea Sp. z o.o. share the content of these documents.

§ 13.

The person appointed by PDA to perform tasks related to the protection of personal data is obliged to conduct cyclical (at least once a year) analysis of risks associated with the risks associated with the processing of personal data and keeping records in this scope.

§ 14.

The person appointed by PDA to perform tasks related to the protection of personal data is also responsible for keeping and updating the documentation in the form of:

- 1) list of rooms in which personal data is processed, constituting the processing area,
- 2) list of sharing personal data with other entities,
- 3) list of entities entrusted with personal data for processing,
- 4) list of personal data sharing to data subjects.

§ 15.

The contractor, as the Personal Data Administrator, is obliged to designate a person (IT) who is obliged to supervise the security of information processed in the IT system used by the contractor.

§ 16.

The contractor, as the Personal Data Administrator, is obliged to prepare documentation in the form of the IT System Management Instruction used to process personal data, specifying in particular procedures for granting rights to personal data processing by users of this system, methods and means of authentication, principles of configuration and use of stationary equipment as well as mobile and electronic data carriers by system users and principles of securing data in the IT system.

