



Bpme Poland App Privacy Statement

1. Information about our organisation and BPMe App

BP EUROPA SE Spolka Europejska Oddzial w Polsce with its registered office in Krakow at 9 Pawia Street, 31-154 Krakow, entered into the register of entrepreneurs kept by the District Court for Krakow Srodmiemie in Krakow, XI Commercial Division of the National Court Registered under KRS number 0000345546, NIP 972-086-54-31 is responsible for the BPMe App.

This privacy statement provides information regarding the processing of your personal data when using the BPMe App. Specifically, it explains what personal data we process about you, why we are processing it and for which purpose, who do we share it with, how long we hold your personal data for and how to access and update your personal data, as well as your privacy rights and how to get more information.

2. Information we collect

We collect most of the personal information we process from you. In some circumstances, we may generate the information ourselves, for instance when we created your user ID. To use BPMe app, we must collect some limited personal data for the functionality of the application. We may require some information from you such as your name, email address, phone number to establish an account.

When you visit our BPMe App, we may process the following personal information about you.

Category	Typical data points	Typical sources
Biographical and Contact Data	Name Date of Birth Telephone number Email address	You /Interface triggered by you
Account Credentials	Username, passwords.	You / generated by us
Transaction Data	Details of transactions you carry out through our channels, of the fulfilment of the services we provide and payment details.	You / generated by us
Preference Data	Marketing or usage preferences you provide us or that we may infer from the other data provided to us.	Generated by us
Correspondence	We will typically keep a record of that correspondence. This may include telephone calls, which we record to assist us in training our staff and undertaking quality checks.	You / Transcripts generated by us
Digital Asset Usage	Information about your device and your use of our App or related communications including IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the App by using cookies and other trackers.	Generated by us or a third party

3. *Why we collect your information and we use it*

We primarily use your information to give you access to BPme App and services related to the App. We keep your information secure by implementing appropriate security measures as required by applicable data protection laws.

Lawful basis

Where required by applicable law, we ensure that we have a lawful basis to use your personal information for the purposes outlined in this Statement. Under GDPR we will rely on Article 6 lawful basis listed below:

- **Performance of the contract** we have with you for the provision of our products or services relating to the BPme App. The terms and conditions [Http://www.bp.com/pl_pl/poland/home/produkty_uslugi/bpme/bpme_terms_conditions.html](http://www.bp.com/pl_pl/poland/home/produkty_uslugi/bpme/bpme_terms_conditions.html) of the App will govern this contract;
- **Our legitimate interests** to use your personal information where it is necessary for our (or a third party's) legitimate interests and those rights do not override your interests, fundamental rights and freedoms. This means we will only use your information for the purposes of a legitimate interest when there is no unfair impact on you;
- **Our legal obligations** we also use your personal information where it is necessary to comply with the law; and
- **Your consent** if you consent to the processing of your personal information in specific cases. You can withdraw your consent at any time as set out below in the section 9 on Data Protection Rights.

4. **Why we collect your information and how we use it**

To make it easy to understand, we have set out in the table below why we collect and how we use your information, and the legal bases we may rely on to do this.

Purpose & processing activity	Information we use	Lawful basis for processing
<p>Customer management - operate and improve our business (as well as our services and products). This includes:</p> <p>BPMe App registration process; management and administration of our customers and business; correspondence; improve and develop our business or our offerings to you and/or carry out customer research/surveys to improve our services; improve the quality, content and relevance of our communications (where you have subscribed to receive our communications via email and/or SMS) by following how you interact with that communication, such as whether you receive, open or click on a link within an email and/or SMS communication.</p>	<p>Biographical and Contact Data</p> <p>Account Credentials</p> <p>Preference Data</p> <p>BPMe App Usage Data</p> <p>Correspondence</p>	<p>Legitimate interests - effectively manage and provide services to you and improve our services.</p>
<p>Verify and execute transactions you initiate using the BPMe App</p>	<p>Biographical and Contact Data</p> <p>Account Credentials</p> <p>Transaction Data</p>	<p>Performance of a contract</p>

Purpose & processing activity	Information we use	Lawful basis for processing
<p>Manage and maintain the BPMe App. This includes:</p> <p>Review and improve the information provided on BPMe App to ensure optimal performance; secure and prevent any potential disruptions or cyber-attacks; conduct troubleshooting/ analysis required to detect malicious code/ actors and understand how this may affect your IT system; and/or statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks.</p> <p>We may also anonymise your personal information for this purpose.</p>	<p>Biographical and Contact Data</p> <p>Account Credentials</p> <p>Preference Data</p> <p>BPMe App Usage Data</p> <p>Correspondence</p>	<p>Legitimate interests - maintaining and managing information technology services, network and data security and fraud prevention.</p>

Purpose & processing activity	Information we use	Lawful basis for processing
<p>Conduct analytics, statistics, and derive insight. This includes:</p> <p>Understand the needs and interests of our customers; undertake market segmentation (including for marketing purposes); conduct market insight activities; and/or personalize the BPMe App or services or communication based on profile data we have applied to you.</p> <p>We may also anonymise your personal information for this purpose. Where this is the case, some privacy laws will not apply.</p>	<p>Biographical and Contact Data</p> <p>Preference Data</p> <p>BPMe App Usage Data</p> <p>Correspondence</p>	<p>Legitimate interest - improve and enhance our business model and services, better understand our customers.</p>

Purpose & processing activity	Information we use	Lawful basis for processing
<p>Send you relevant direct marketing communications. This includes:</p> <p>Communicate with you to provide you with information about BP and those of our partners services, products, and/or events that may be of interest to you via email or SMS, or in App.</p>	<p>Biographical and Contact Data</p> <p>Preference Data</p> <p>BPMc App Usage Data</p> <p>Correspondence</p>	<p>Legitimate interest - inform our customers about BPMc App and our products and services, or Consent collected in the registration process where required by relevant laws.</p> <p>You can withdraw this consent/unsubscribe at any time by clicking on the unsubscribe link in each of our communication, by updating your preference in the BPMc App, or by contacting our customer care.</p>
<p>Legal and regulatory purposes.</p> <p>This includes:</p> <p>Comply with and assess compliance with applicable laws, rules and regulations, and internal policies and procedures, and other due diligence checks; prevent and detect fraud and/or other criminal activity or misconduct; and/or establishment and handling of legal claims.</p>	<p>Biographical and Contact Data</p> <p>BPMc App Usage Data</p> <p>Correspondence</p> <p>Identification</p> <p>Transaction Data</p>	<p>Legal obligations, where the processing activity is required by law or regulation.</p> <p>In all other cases, legitimate interests (to comply with our obligations and exercise our legal rights).</p>

Purpose & processing activity	Information we use	Lawful basis for processing
Receive business support (such as consultancy, banking, legal, insurance and accounting services) or to restructure our business, including in the context of sales, transfers, mergers and acquisitions (and the negotiations of the foregoing).	Biographical and Contact Data Account Credentials Preference Data BPMe App Usage Data Correspondence	Legitimate interest - Restructuring our business

Profiling

We may use automated processing to apply profiles to your personal information, to personalize the BPMe App or services, decide what to advertise to you and/ or as part of security threat detection and prevention.

5. Security Precautions

We take precautions to protect data and information under our control from misuse, loss, or alteration. Our security measures include industry-standard physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services.

6. Information we share

We may share your information with bp entities and third-party recipients, such as external service providers, social media companies (if you have requested or agreed to this) and legal or regulatory bodies. We have contracts in place with these third parties to protect the use of your information, and any service provider we appoint is contractually required to comply with privacy laws and security measures.

We set out further details about the information we share with service providers and other third parties in the table below.

Service provider/ third party	Purpose	Information Shared
<p>Other bp entities: We may share your information with other bp entities or companies that we acquire in the future after they are made part of the bp group, to the extent such sharing of information is necessary to administer and manage the BPMe App.</p>	<p>Account administration e.g. we share your information with other bp entities as part of our business operations, including with our parent company bp plc, headquartered in the UK</p> <p>Data and records management</p>	<p>Contact information</p> <p>BPMe App Usage Information</p>
<p>Third Party partners and service providers - We may share your personal information with third-party service providers, agents and contractors to provide services to us. Any third-party provider we appoint must protect your personal information in line with the contractually required security measures embedded into our sourcing process.</p>	<p>IT systems and support</p> <p>Operation and management of our business partnerships (e.g. administering and promoting their products/services)</p>	<p>Contact information</p> <p>BPMe App Usage Information</p>
<p>Professional Advisors like lawyers and accountants</p>	<p>Legal and accountancy advice</p> <p>Advice from other professional advisors e.g. we share your personal information with third parties (and their advisors) to whom we may choose to sell, transfer or merge parts of our business or our assets</p>	<p>Contact information</p> <p>BPMe App Usage Information</p>
<p>Regulatory authorities, courts, and other public authorities- these authorities may be situated outside your country. In</p>	<p>Regulatory and compliance e.g. we disclose your information as required by applicable laws</p>	<p>Contact information</p> <p>BPMe App Usage Information</p>

<p>these instances, the legal or regulatory authority will be a data controller (not acting on our instructions) and will be primarily responsible for deciding how your information is held and used once shared by us.</p>	<p>Tax</p> <p>Conduct of complaints or legal claims e.g. we disclose your information when we believe that disclosure is necessary to protect our rights or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on bp</p>	
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7. International transfers

As an international company, we may transfer your personal information to other bp group entities around the world. For instance, our entities based in the UK, USA or India may access information for IT support purposes. Where this is the case, we ensure that the importing country offers an adequate level of data protection compliance, or we will rely on our global compliance framework which includes appropriate data transfer measures and safeguards to ensure that we protect your personal information in accordance with applicable data protection laws.

Concerning transfers between group entities, we rely on our intragroup agreement which includes the EU Commission approved standard contractual clauses and the UK IDTA, as each may be amended or updated from time to time. Where we transfer personal information to a third-party outside the bp group, we ensure that appropriate measures are in place to offer an adequate level of protection for your personal information. As above, this includes the use of approved relevant standard contractual clauses as required under applicable laws.

8. Retention of your information

How long we will hold your personal information will vary based on the purpose for which we are using it. We will need to keep your information for as long as is necessary for each purpose in line with our business needs, as documented in our internal policies.

We calculate the retention period based on the time the personal information is needed to: (a) fulfil the purposes described in this Privacy Statement, (b) meet the timelines required or recommended by regulatory authorities, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

There may be laws or regulations which set a minimum period for which we have to keep your personal information. We will only hold your information for the defined retention period, before anonymizing the information or deleting it. We anonymise data using a mixture of measures, including aggregating the data (for example, to make a finding about a group of

people as opposed to a specific individual) or by removing any personal identifiers (for example, unique IDs or contact information) so that we can still use data to see trends and patterns but cannot link this data back to you.

If you choose to unsubscribe from the BPM App, we may keep a 'suppression list' containing your details so we know you have unsubscribed and ensure you are not contacted again. Your personal information held on a suppression list will not be used for any other purpose.

9. Your Rights

The rights set out below apply to your usage of the BPM App. It is important to understand that there are situations in which these rights may not apply, for instance where they are not relevant to your request. For this reason, applicable rights will depend on your specific circumstances.

9.1 Data Protection Rights

- **Access to your personal information.** Where applicable, you are entitled to receive a copy of personal information we hold about you.
- **Correction of the personal information that we hold about you.** You may request that we correct any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data you provide to us. It is important that the personal information we hold about you is accurate and current. Please contact us using the contact details below to update us in the event of any changes to your personal information.
- **Erasure of your personal information.** You may request that we delete or remove personal information where there is no overriding reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we have processed your information unlawfully or where we are required to erase your personal information to comply our legal obligations.
- **Right to Object** - Where we process your personal information based on legitimate interests, you have the right to object to such processing, including profiling on grounds relating to your particular situation, at any time. If you exercise your right to object, we will stop processing your personal information in that context. In some cases, however, we may demonstrate that we have compelling legitimate grounds to continue to process your personal information and if this is the case, we will inform you.
- **Restriction of processing of your personal information.** You may ask to suspend the processing of your personal information in the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

- You have objected to our use of your information, but we need to verify whether we have overriding legitimate grounds to continue to process it.
- **Transfer of certain of your personal information to you or a third party.** Where this right applies, we will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to information you provided to us and which we process on the basis of consent or where it is necessary to perform a contract with you.
- **Withdraw consent where we are relying on consent to process your personal information.** Withdrawal will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Where we seek consent, it can be withdrawn through the App's privacy center centre, or by contacting our customer service at +48 721 02 03 04, or email us at obsługa@bp.com.

9.2 Right to complain to your supervisory authority

We are committed to working with you to resolve any complaint you may have about how we use your information. If you have any concerns or wish to make a complaint, please use contact our customer service at +48 721 02 03 04, or email us at obsługa@bp.com.

You may have the right to complain to the [Urząd Ochrony Danych Osobowych](#).

10. Third party websites we link to

Our BPMe App may contain links to external websites, services or content provided by third parties, which are outside of our control and are not covered by this Statement. Using this external content may allow third parties to collect or share information about you. The privacy practices of these third parties are governed by their own privacy statement. We encourage you to read these third parties' terms, to better understand their privacy practices.

11. Changes to this Privacy Statement

This Statement was last updated on 26/09/2024. We will update it again when necessary to reflect changes in the law and our practices. If we make a material change to this Statement, you will be provided with appropriate e-mail notice in accordance with legal requirements.

We encourage you to periodically review this Statement to stay informed about our collection, processing and sharing of your personal information.

