

# Privacy and Cookies Policy

## I. Personal Data

We are publishing this document to clarify why we collect and process personal data as part of our business activities.

### 1. What are personal data?

Personal data are all the information allowing us to fairly easily distinguish one individual from another. The information can either refer directly to such a person (for instance, a name and surname, identification number, and at times even an e-mail address or online account) or it can involve such data that do not describe an individual directly. For instance, the information pertains to a person's features, medical condition, beliefs, address of residence, addictions, race or denomination.

### 2. What kind of personal data do we deal with?

We process the data provided to us by our Clients, Business Partners and Employees, which is related with them making use of our services, co-operating with us or working for us.

### 3. What does data processing mean?

Processing encompasses any activities that we may carry out with the personal data, involving both the active usage of the data, such as collecting, downloading, recording, combining, modifying or making available, and related with the passive use, such as storing, restricting, deleting or destroying.

### 4. Who is a data controller (i.e. who has impact on the processing and security of the data)?

The Controller of your data is **Politech Sp. z o.o.** with registered office in Osielsko, ul. Jana Pawła II 79, 86-031 Osielsko, Poland, Tax Id. No. (NIP) 554-22-92-680, Industry Id. No. (REGON) 92480959, represented by the Management Board, tel. No. + (48 52) 375 63 00, correspondence e-mail address: **info@politech.pl**.

### 5. On what legal basis do we process your data and for what purpose?

Your data must be always processed based on a relevant basis compliant with applicable provisions of law. Such basis can be your consent for the processing of the data, or other legal provisions allowing for such processing, either included in the Polish Personal Data Protection Act of 29 August 1997 or in the Regulation (EU) 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 (referred to as the "GDPR").

We might process your data for several various purposes, for example:

- ✓ you can provide us with your data by sending us an e-mail or by using a contact form available on our website. In such a case, we process your data based on your consent which you grant automatically when you send us your data (for example, an e-mail address). Your consent is

voluntary – remember that you may withdraw it at any time. If so, we will promptly delete all the information submitted by you provided that you have not become our Client;

- ✓ if you are our Client or if you are interested in using services rendered by us, we process your data in connection with an agreement concluded with you or as part of preparation to conclude the agreement. This is always done with your knowledge and consent. Expressing an intention to conclude the agreement, you know what personal data are needed to sign it, and after signing the agreement, you know what data you have provided or will provide at a later date for this purpose;
- ✓ if you are a User of the services offered by us, for instance if you receive our newsletter – we process your data based on your consent. You express it by ticking relevant fields in a web form prepared by us. Your consent is voluntary – remember that you may withdraw it at any time. In such a case, we will stop rendering any services for you and we will promptly delete all the data submitted by you;
- ✓ we may also process your data in connection with necessity to ensure security of our IT network and information. This will happen when you use our IT infrastructure or connect with it, for instance by entering our website or sending us e-mails. This is our legitimate interest;
- ✓ if you want to start working for us, your data are processed in the form of your application or CV sent by you. This happens with your knowledge and written consent which you may withdraw at any time. In such a case, we will not consider your application and we will promptly delete all the data submitted by you. As of the moment when you start working for us, any further rules governing the data processing and the obligatory scope of their submission and further processing are specified by labour law.

## **6. To whom do we transfer your data?**

In compliance with the applicable laws, we may transfer your data to entities processing them on our request, such as, for example, a postal service operator, accounting office or subcontractors performing our services indicated in the agreement concluded with you. We are also obliged to provide the data on the request of authorities entitled to receive them under other provisions of law, for example courts or law enforcement bodies. We will make such data available only when the authorities request of us to do so, indicating a legal basis allowing them to submit such a request.

We do not expect to transfer your data to any third countries or international organisations, i.e. outside the economic area of the European Union. Within the territory of the European Union, the level of protection of your data is guaranteed to be identical in all its member states, thanks to the GDPR. The GDPR is available at the address:

<http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=OJ:L:2016:119:TOC>

## **How long will we process your data?**

We attach great importance to restricting the scope of the data that we collect, and time when they are processed, to a required minimum. Therefore, we systematically review paper and electronic documents in our possession, getting rid of the redundant ones that are no longer needed. Remember that other legal provisions beyond our control obliging us to store your data, regardless of your will or intention, can be decisive as regards the time of processing your data, depending on a ground based

on which we have obtained them. This can involve, for instance, labour law, social security regulations or accounting provisions.

We can obtain your data also in connection with, for example, a training session conducted by us; then we may process the data for a short period for purposes related to financial settlements with an entity that has hired us to conduct the training or in order to issue a certificate confirming your participation in the training. After these activities, we will promptly delete your data and for certain we will not use the data for any other purpose, for example to advertise our activities, unless you have clearly and expressly agreed to it.

If you have used our services in person and we have concluded a relevant agreement, in conformity with accounting regulations we will keep your data in financial and accounting documentation created in connection with it, and we will process the data for the period of five consecutive calendar years as of the date of purchase/agreement.

If the data in our possession were supposed to be used for another purpose than the one for which they have been obtained, you will always be informed of it and you will be able to object to it.

## **7. What rights do you have in reference to your data?**

If we process your personal data, you always have the right to:

- request access to the data
- rectify the data
- request to erase the data
- restrict processing the data
- object to processing of the data
- transmit the data, which includes receiving the copy of the data.

All these rights are described in detail in Art. 15–21 of the GDPR available at the address:

<http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=OJ:L:2016:119:TOC>

You may also withdraw your consent for the personal data processing; in such a case, we will promptly delete your personal data provided that we are not legally obliged to further process them. For instance, if you want to delete your account following your resignation from receiving our newsletter, we will promptly delete your data from our mailing list.

If you believe that we have violated your rights in any way, which we of course will strive to avoid, or if we have failed to guarantee security for your personal data, you have the right to file a complaint with a supervisory authority which currently is the President of the Personal Data Protection Office.

## **8. Automated decision-making and information on profiling**

Based on your data, we do not take any automated decisions, i.e. such decisions that would be made without involvement of a person. Further, we do not undertake any activities aimed at profiling you.

## **9. How do we protect your data?**

In order to guarantee security of your data, we apply legally required organisational and technical measures. In our office, we have installed necessary physical protection measures preventing unauthorised parties from accessing the data. Our employees have required authorisations and can process the data in a limited manner, i.e. only to such extent which is necessary for them to properly perform their professional duties.

## **10. Protection of privacy of minors**

Our website does not monitor or verify information on the age of its users, senders or recipients of any messages and of anybody interested in receiving notifications about our activities, including our newsletter. Contact information from visitors (such as telephone numbers and e-mail addresses of the users) are used to fulfil orders, send information on our company and commercial offers.

Minors should not send any information, make orders or subscribe the services rendered by our company, without consent of their parents or legal guardians. We will request such consent in each case when we become aware that any user is a minor (“child”) within the meaning of the Polish personal data protection regulations.

## **11. Contact data of a person responsible for personal data protection**

In all personal data protection related issues please contact the following email address: [info@politech.pl](mailto:info@politech.pl).

# **II. Cookies**

## **1. What are cookies and what are they used for?**

Cookies are text files saved in your device and used by a server to recognise the device at the next connection. The cookies are downloaded at each instance of accessing and leaving a website. The cookies do not serve to establish your identity, they are used only to identify your device, among other things so that, after recognising your browser, a displayed image can be best adjusted to technical features of hardware (for instance, its resolution) or its type (stationary version – desktop or mobile one).

The cookies are used most frequently in case of counters, surveys, online stores, websites requiring login, advertisements, and to monitor activity of websites’ visitors. Further, the cookies allow for recording your interests and for adjusting websites to them as regards displayed content and advertisements.

Presently, the cookies are used in practically all the websites: search engines, information websites, blogs, online stores, websites of offices, magazines and newspapers etc. Our site uses them as well.

More information on the cookies can be found on the website: [www.wszystkooociasteczkach.pl](http://www.wszystkooociasteczkach.pl).

## 2. What do the cookies do?

Generally, they operate according to the following rules:

- they identify data of a computer and browser used to visit websites – for instance, they provide information if a given computer has already visited a website;
- data acquired from the cookies are in no way combined with users' personal data obtained, for example, during registration at any site;
- they are not detrimental to you, your computers or smartphones – they do not affect the way in which such devices operate;
- they do not lead to any configuration changes in terminal equipment or in software installed in such equipment;
- default parameters of the cookies allow for reading information contained in them only by a server that has created them;
- based on your activity on visited websites, they pass to servers information thanks to which displayed websites can be better adjusted to individual preferences.

## 3. What kind of cookies are there?

There are the following types of the cookies:

- **session cookies** – are temporary files saved in a browser's memory until the end of a session (i.e. until the moment of closing the browser). These files are mandatory so that some applications or functionalities can properly work. After closing the browser, they should be automatically deleted from a device used to visit any website;
- **persistent cookies** – they facilitate the usage of frequently visited websites (for example, they remember a favourite colour- or menu-layout of your favourite websites). These files are stored in a relevant folder for a longer period that you can adjust in settings of your browser. Whenever you visit any website, data from such cookies are transferred to a server. This type of the cookies is sometimes referred to as the tracking cookies;
- **third parties cookies** – are files coming usually from advertisement servers, searching servers etc., co-operating with an owner of a given website. Thanks to them, advertisements displayed are adjusted to your preferences and customs, which, in turn, frequently allows you to use part of a website's content free of charge. They also enable counting clicked advertisements, users' preferences etc.

## 4. Do you have to agree to us using the cookies?

Remember that you can manage the cookies on your own. For instance, this opportunity is offered by web browsers that you use (usually, this mechanism is turned on by default). In the most popular browsers, you can:

- accept the cookies, which will allow you to fully use options offered by websites
- manage the cookies on the level of individual websites selected by you

- specify settings for various types of the cookies, for instance accepting persistent files as session ones etc.
- block or remove the cookies.

Information on options of turning the cookies on and off in the most popular browsers is available at the following links:

- 1) [Google Chrome](#)
- 2) [Internet Explorer](#)
- 3) [Mozilla Firefox](#)
- 4) [Opera](#)
- 5) [Safari](#)

If you leave your browser's settings unchanged, this means your consent for us to use the cookies. If you block or turn off some of them, on the other hand, you can be prevented from using the full functionality of the website, or disrupt its proper operation.

#### **5. What do we use the cookies for?**

In our website, we use both the session and persistent cookies. We use them for the following purposes:

- to prepare statistics, which helps improve the content of the websites and their structure
- to maintain a session of the website's User.

In order to properly display the website, we collect the following information: a name and version of a web browser, language settings, a date and time of sending a request to a server, an IP address from which the request has been sent, requested URL. Such data are collected so that the website can be properly used.

In order to prepare the statistics we use Google Analytics, an online analytics tool, which collects data and uses its own cookies in compliance with the Google Privacy Policy available at the address <https://www.google.com/intl/pl/policies/privacy/>.

In its servers, Google collects data acquired from its cookies placed in devices, and uses such information to prepare reports and provide other services related to online traffic and web usage. Google can also transfer the information to third parties if it is obliged to do it by law or if such parties process the information on Google's behalf.

The data collected by our website are not disclosed or made available to any third parties, with the exception of appropriate law enforcement bodies authorised to conduct criminal proceedings if they instigate such proceedings on our request. This can happen only if you undertake any illegal activities or activities detrimental to us.