

### **PRIVACY POLICY**

https://rgbelektronika.eu/
https://www.rgbautomatyka.pl/en/
https://sklep.rgbelektronika.pl/

### I. General Information

This privacy policy (hereinafter referred to as the "Policy") of the website operated under the domain <a href="https://rgbelektronika.eu/">https://rgbelektronika.eu/</a> (hereinafter referred to as the "Website") and the associated online shops operated under the domains <a href="https://rgbelektronika.eu/">https://rgbelektronika.eu/</a> and <a href="https://sklep.rgbelektronika.pl/">https://sklep.rgbelektronika.pl/</a> (hereinafter referred to as the "Shop") is intended for Users of the Website and the Shops who are natural persons (hereinafter referred to as "Users") and contains information about the processing of Users' personal data in connection with the use of the Website to the extent required by Article 13 of 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 (General Data Protection Regulation) (hereinafter referred to as "GDPR"), as well as on the cookies used by the website Controller to the extent required by Article 173 of the Act of 16 July 2004 — Telecommunications Law.

### II. Controller of Users' Personal Data

The controller of the Users' personal data within the meaning of Article 4, section 7 of the GDPR, i.e. the entity deciding on the purposes and methods of processing the Users' personal data, is the company under the name RGB Elektronika Spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office in Wrocław (51-162 Wrocław) ul. Jana Długosza No. 2-6, entered in the Register of Entrepreneurs of the National Court Register under the KRS number: 0000750271 (hereinafter referred to as "the Company" or "the Controller").

If Users have any questions or concerns about the Company's processing of Users' personal data or wish to exercise their rights under the RODO, they may address their correspondence to the email address: iod@rgbelektronika.pl or in writing to the Company's address.

The Controller has implemented the appropriate technical and organisational measures required by the GDPR to ensure the security of the Users' personal data being processed.

# III. Aims and Legal Bases for Personal Data Processing

The Controller may process Users' personal data for the following purposes:

### A. Setting up an Online Shop Account

In order for the User to set up and for the Controller to maintain the account assigned to the User in the online shop hosted on the domains <a href="https://www.rgbautomatyka.pl/en/">https://www.rgbautomatyka.pl/en/</a> and/or

https://sklep.rgbelektronika.pl/ the Controller shall process the personal data provided by the User in the process of logging in, i.e. name and surname, e-mail address and password established by the User, as well as the personal data completed after the registration of the Customer Account: mailing address and registration data of the User's company. The basis for the processing of the User's personal data in such a case is Article 6, section 1, letter a) of the GDPR, i.e. the User's consent to the processing of his/her data for the purpose of setting up and maintaining a customer account.

# B. Placing Orders for Goods via the Online Shop

In the event that the User orders goods via an online shop hosted on the domains <a href="https://www.rgbautomatyka.pl/en/">https://sklep.rgbelektronika.pl/</a> the Controller will process the personal data provided by the User during the login process, i.e. the User's first name and surname, mailing address and the User's company registration details, as well as the details of the payment account from which payment for the order was made. The basis for the processing of the User's personal data in such a case is Article 6, section 1, letter b) of the GDPR, i.e. the necessity of processing the User's personal data for the performance of the contract of sale of goods concluded through the Shop.

#### Furthermore:

Objective	Types of personal data
Registration	<ul> <li>Name and surname - necessary for us to later issue a sales document and address the parcel;</li> <li>e-mail address - necessary for logging in and communication related to the order, the e-mail address is also a login;</li> </ul>
	password - necessary to log in;
	After creating a customer account, you can add:
	<ul> <li>default delivery address (street, house number/or house and apartment number, postal code, city, voivodeship, country) - necessary for us to ad- dress the shipment later;</li> </ul>
	<ul> <li>the company and its NIP (EU VAT) - necessary for us to issue an invoice;</li> <li>telephone number;</li> </ul>
	<ul> <li>primary billing address (street, house number/or house and apartment number, postal code, city, voivodeship, country);</li> </ul>
	<ul> <li>telephone number - if the payer is a person/company other than the person placing the order - necessary to issue an invoice and send it to the indicated person.</li> </ul>
	The data provided during registration are processed only by the online store and
	are not used in any other way, nor are they transferred to other entities, including
	third countries or international organizations.
Submit an order	<ul> <li>Name and surname or name of the company/institution - necessary to issue a sales document and address the shipment;</li> </ul>



- registered office address (street, house number/or house and apartment number, postal code, city, country) - necessary to issue a sales document;
- e-mail necessary for communication related to the execution of the order;
- telephone number necessary when selecting certain delivery methods (required by carriers);
- NIP number (EU VAT) necessary to later issue a sales document.

If, when placing an order, you choose delivery to an address other than the one indicated during registration or when placing the order, please additionally provide the following data:

- name and surname or name of the company/institution necessary for us to address the parcel;
- address (street, house number/or house and apartment number, postal code, city, country) necessary to address the parcel;
- telephone number of the shipment recipient necessary when selecting some delivery methods (required by carriers).
- NIP number (EU VAT) necessary to later issue a sales document.

If, when placing an order, you choose to issue a sales document with data other than those indicated when registering or placing an order, please additionally provide the following data:

- name and surname or name of the company/institution necessary to issue a sales receipt;
- address (street, house number/or house and apartment number, postal code, city, country) - necessary to issue a proof of sale;
- NIP number (EU VAT) necessary to issue a proof of sale.

### **IMPORTANT!**

When placing an order, please provide us with the data necessary to complete the order, which in the case of registered and logged-in customers is partially downloaded automatically from the data provided during registration.

The online store cooperates with PayPal and First Data (secure online payment) as payment operators.

If you use a payment using an external payment system, all data provided after going to the website of each payment operator remains registered only in its database and is in no way available or stored by the online store operated by the RGB Company.

### C. Commissioning the Repair of a Device



When the User places an order for the repair of their appliance on the "Order a repair" tab, the Controller will process the personal data provided by the User in the order form, i.e. the User's name and surname, mailing address and registration data of the User's company, as well as the data of the payment account from which the payment for the order was made. The basis for the processing of the User's personal data in such a case is Article 6, section 1, letter b) of the GDPR, i.e. the necessity of processing the User's personal data for the performance of the service contract of the User's device.

# D. Fulfilment of Tax Obligations by the Controller

If the Controller concludes a contract with the User creating an obligation for the Controller to issue a VAT invoice, the Controller will process the User's data necessary for its issuance, i.e. the User's company registration data, in particular the tax identification number. The basis for the processing of the User's personal data in such a case is Article 6, section 1, letter c) of the GDPR, i.e. the necessity of processing the User's personal data for the performance of a legal obligation by the Controller.

### E. Online Chat Contact

In order to respond to a User's message to the Controller via online chat, the Controller may process the User's personal data entered into the chat window. The legal basis for the processing of the User's data for this purpose is Article 6, section 1, letter a) of the GDPR, i.e. the User's consent to the processing of their data in order to respond to the User's contact via online chat.

### F. Contact with the User via the Contact Form and Other Communication Channels

In order to reply to the User's message addressed to the Controller through the contact form available in the "Contact" tab or through other channels to the Controller's contact data provided on the site (e-mail or telephone call), the Controller may process the User's personal data entered in the contact form, i.e. name and surname, e-mail address, telephone number and company name, or voluntarily provided by the User in the content of the e-mail message or during a telephone call. The legal basis for the processing of the User's data for this purpose is Article 6, section 1, letter a) of the GDPR, i.e. the User's consent to the processing of his/her data in order to respond to the User's contact.

### G. Recruitment of Job Applicants

In order for the Controller to process the recruitment documents sent by the User in response to job advertisements in the "Career" tab, the Controller will process the User's data necessary to carry out the recruitment process, in particular the data resulting from the recruitment documents attached by the User. The legal basis for the processing of the User's data for this purpose is Article 6, section 1, letter a) of the GDPR, i.e. the User's consent to the processing of his/her data in order to participate in the recruitment for a job at the Controller's company expressed by sending recruitment documents.

### H. Sending a Newsletter

In order to send newsletters to Users who have given their consent, the Controller will only process the User's e-mail address entered in the newsletter sign-up form. The legal basis for the processing of the User's data for this purpose is Article 6, section 1, letter a) of the GDPR in conjunction with Article 10, section 2 of the Act of 18 July 2002 on the Provision of Electronic Services (hereinafter referred to as the "AES"), i.e. the User's consent to receive commercial information in the form of a newsletter at the indicated e-mail address.

## I. Display of Advertising Content

The Controller may process the User's personal data in order to display on the User's terminal equipment advertising content tailored to the User's preferences established on the basis of the User's activity history on the Website through the use of cookies. The basis for the processing of the User's personal data for this purpose is Article 6, section 1, letter a) of the GDPR, i.e. the User's consent to the use of cookies by the Service.

# J. Keeping Statistics on the Use of the Website's Functionalities

The Controller may process the User's personal data in order to keep statistics on the use of the various functionalities of the Website, to facilitate the use of the Website and to ensure the IT security of the Website. Personal data is then processed regarding the User's activity on the Website and the amount of time spent on each subpage on the Website, the User's search history, location, IP address, device ID, browser data and the User's operating system. The basis for the processing of the User's data in such a case is Article 6, section 1, letter f) of the GDPR, i.e. the legitimate legal interest of the Controller in processing the User's personal data.

### IV. What Data is Collected Automatically When I Access the Website and the Shop?

#### A. Server

The IT system used by the website automatically collects data related to the device used by the User in logs. These data are collected only for statistical purposes and relate to: IP address, downloaded page files or exit address and are only used for diagnostic purposes. This data is never combined with the data provided by the user and is only material for statistical analysis and system error correction mechanisms.

### B. Cookies

The website uses "cookie" technology, i.e. text files placed on the User's device, for the technical purposes of serving the session.

Name	Supplier	Objective	Expiry date	
_grecaptcha	<u>Google</u>	This cookie is used to distin-	Persistent	HTML Local Stor-
		guish between humans and		age
		bots. This is beneficial for the		
		website, in order to make valid		



		reports on the use of their web-		
		site.		
_GRECAP-	Google	This cookie is used to distinguish	180 days	HTTP Cookie
TCHA		between humans and bots. This		
		is beneficial for the website, in or-		
		der to make valid reports on the		
		use of their website.		
bscookie	<u>LinkedIn</u>	This cookie is used to identify the	1 year	HTTP Cookie
		visitor through an application.		
		This allows the visitor to login to		
		a website through their LinkedIn		
		application for example.		
CookieCon-	Cookiebot	Stores the user's cookie consent	1 year	HTTP Cookie
sent		state for the current domain		
li_gc	<u>LinkedIn</u>	Stores the user's cookie consent	180 days	HTTP Cookie
		state for the current domain		
rc::a	<u>Google</u>	This cookie is used to distinguish	Persistent	HTML Local Stor-
		between humans and bots. This		age
		is beneficial for the website, in or-		
		der to make valid reports on the		
		use of their website.		
rc::b	Google	This cookie is used to distinguish	Session	HTML Local Stor-
		between humans and bots.		age
rc::c	Google	This cookie is used to distinguish	Session	HTML Local Stor-
		between humans and bots.		age
rc::d-15#	Google	This cookie is used to distinguish	Persistent	HTML Local Stor-
		between humans and bots.		age
SERVERID	forms.freshmail.io	This cookie is used to assign the	Session	HTTP Cookie
		visitor to a specific server - this		
		function is necessary for the		
		functionality of the website.		

Cookies are small text files that can be used by websites in order to allow users to use the pages more efficiently.

If the User does not agree to the placement of cookies on their device, they can block their placement by configuring their Internet browser accordingly. Information on how to do this can be found in the help files of the web browser the User is using. However, if cookies from the Website are blocked, the Controller cannot guarantee its correct functioning.

If the User agrees to cookies being placed on their device, but would like to delete them after visiting the website, information to this effect can be found in the help files of the Internet browser the User is using.

The website uses different types of cookies. Some cookies are placed by third-party services which appear on our pages. The User may withdraw their consent in the Service's cookie declaration at any time.



At any time, you can also withdraw your consent or change your cookie preferences by changing the settings in Cookiebot on our website <a href="https://rgbelektronika.eu/">https://rgbelektronika.eu/</a>

The cookie declaration was last updated on 30 January 2024 by Cookiebot:

Essential cookies contribute to the usability of the website by enabling basic functions such as site navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Preference cookies allow the site to remember information that changes the appearance or functioning of the site, such as your preferred language or the region in which you are located.

Name	Supplier	Objective	Expiry date	Туре
lidc	<u>LinkedIn</u>	Registers which server-cluster is	1 day	HTTP Cookie
		serving the visitor. This is used		
		in context with load balancing, in		
		order to optimize user experi-		
		ence.		
maps/gen_204	<u>Google</u>	Used in context with the web-	Session	Pixel Tracker
		site's map integration. The		
		cookie stores user interaction		
		with the map in order to optimize		
		its functionality		
wp-wpml_current_lan-	rgbel-	Designates the country code	1 day	HTTP Cookie
guage	ektronika.pl	that is calculated based on the		
		user's IP address. Used to deter-		
		mine what language should be		
		used for the visitor.		

Statistical cookies help website owners understand how different users behave on the website by collecting and reporting anonymous information.

Name	Supplier	Objective	Expiry date	Туре
utm.gif	Google	Google Analytics Tracking Code	Session	Pixel Tracker
		that logs details about the visi-		
		tor's browser and computer.		
utma	<u>Google</u>	Collects data on the number of	2 years	HTTP Cookie
		times a user has visited the		
		website as well as dates for the		
		first and most recent visit. Used		
		by Google Analytics.		
utmb	<u>Google</u>	Registers a timestamp with the	1 day	HTTP Cookie
		exact time of when the user ac-		
		cessed the website. Used by		



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		Google Analytics to calculate the		
		duration of a website visit.		
utmc	Google	Registers a timestamp with the	Session	HTTP Cookie
		exact time of when the user		
		leaves the website. Used by		
		Google Analytics to calculate the		
		duration of a website visit.		
utmt	Google	Used to throttle the speed of re-	1 day	HTTP Cookie
		quests to the server.		
utmv	Google	Saves user-defined tracking pa-	Session	HTTP Cookie
		rameters for use in Google Ana-		
		lytics.		
utmz	Google	Collects data on where the user	6 months	HTTP Cookie
		came from, what search engine		
		was used, what link was clicked		
		and what search term was used.		
		Used by Google Analytics.		
_ga	Google	Registers a unique ID that is used	2 years	HTTP Cookie
		to generate statistical data on		
		how the visitor uses the website.		
_ga_#	Google	Used by Google Analytics to col-	2 years	HTTP Cookie
		lect data on the number of times		
		a user has visited the website as		
		well as dates for the first and		
		most recent visit		
_gat	Google	Used by Google Analytics to	1 day	HTTP Cookie
		throttle request rate		
_gid	Google	Registers a unique ID that is used	1 day	HTTP Cookie
		to generate statistical data on		
		how the visitor uses the website.		
_hjSession_#	<u>Hotjar</u>	Collects statistics on the visitor's	1 day	HTTP Cookie
		visits to the website, such as the		
		number of visits, average time		
		spent on the website and what		
		pages have been read.		
_hjSessionUser_#	<u>Hotjar</u>	Collects statistics on the visitor's	1 year	HTTP Cookie
		visits to the website, such as the		
		number of visits, average time		
		spent on the website and what		
		pages have been read.		
AnalyticsSyncHistory	LinkedIn	Used in connection with data-	30 days	HTTP Cookie
		synchronization with third-party		
		analysis service.		



# CENTRE OF INDUSTRIAL AUTOMATION

collect	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Session	Pixel Tracker
hjActiveViewportIds	<u>Hotjar</u>	This cookie contains an ID string on the current session. This contains non-personal information on what subpages the visitor enters – this information is used to optimize the visitor's experience.	Persistent	HTML Local Storage
hjViewportId	<u>Hotjar</u>	Saves the user's screen size in order to adjust the size of images on the website.	Session	HTML Local Storage
td	Google	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	Session	HTML Local Storage

Marketing cookies are used to track users on websites. The aim is to display advertisements which are relevant and interesting to individual users and thus more valuable to third-party publishers and advertisers.

Name	Supplier	Objective	Expiry date	Туре
_fbp	Meta Plat-	Used by Facebook to deliver a se-	3 months	HTTP Cookie
	forms, Inc.	ries of advertisement products		
		such as real time bidding from		
		third party advertisers		
ads/ga-audiences	<u>Google</u>	Used by Google AdWords to re-	Session	Pixel Tracker
		engage visitors that are likely to		
		convert to customers based on		
		the visitor's online behaviour		
		across websites.		
bcookie	<u>LinkedIn</u>	Used by the social networking	1 year	HTTP Cookie
		service, LinkedIn, for tracking the		
		use of embedded services.		
lastExternalReferrer	Meta Plat-	Detects how the user reached	Persistent	HTML Local
	forms, Inc.	the website by registering their		Storage
		last URL-address.		
lastExternalRefer-	Meta Plat-	Detects how the user reached	Persistent	HTML Local
rerTime	forms, Inc.	the website by registering their		Storage
		last URL-address.		
li_sugr	<u>LinkedIn</u>	Collects data on user behaviour	3 months	HTTP Cookie
		and interaction in order to		



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		optimize the website and make advertisement on the website more relevant.		
rc::f	Coogle	This cookie is used to distinguish	Persistent	HTML Local
161	<u>Google</u>		Persisterit	
		between humans and bots		Storage
UserMatchHistory	<u>LinkedIn</u>	Ensures visitor browsing-secu-	3 months	HTTP Cookie
		rity by preventing cross-site re-		
		quest forgery. This cookie is es-		
		sential for the security of the		
		website and visitor.		

The Website in case of User's approval in the Cookiebot tool, uses also extended conversions used by Google. If the approval in question is given by User, the Website may identify a User with a Google account who uses the Website on different terminal devices (e.g. phone and computer) as the same User. User's consent to the Webiste's use of extended conversion causes that the encrypted data of the Users with a Google account in the form of an e-mail address and a telephone number are transferred to the IT system used by the Website. Data are only stored in encrypted form that prevents them from being linked to the User's personal data. The Website uses the User's personal data collected through this technology for marketing purposes, in particular to analyse the effectiveness of marketing activities.

Unclassified cookies are cookies that are in the process of being classified, along with the providers of the individual cookies.

Name	Supplier	Objective	Expiry date	Туре
rgbelektronika-	rgbelektro-	In anticipation	Persistent	HTML Local
adc91b2c-745d-4e43-	nika.pl			Storage
878d-	cdn.thu-			
bbff088f91b3chat-	lium.com			
widget-state [x2]				
rgbelektronika-	rgbelektro-	In anticipation	Persistent	HTML Local
cc12fec6-86d6-4f36-	nika.pl			Storage
8b60-	cdn.thu-			
2b88f0dd1800chat-	lium.com			
widget-state [x2]				
THULIUM_SESSION	chat-	In anticipation	Session	HTTP Cookie
	proxy-ser-			
	vice.thu-			
	lium.com			

### C. Google Analytics (cookies)

Google Analytics uses the technology of "cookies", which are text files placed on the User's device, to enable the Controller to analyse the sources of traffic and the way in which visitors use it.



Google collects the data obtained from the placement of cookies on the User's device on its servers and uses this information to create reports and provide other services relating to traffic and Internet usage.

Google may also transfer this information to third parties where it is required to do so by law or in the case in which such third parties process the information on Google's behalf.

This data is never combined with the data provided referred to in Part III of this privacy policy and is only material for statistical analysis and system error correction mechanisms.

If the User does not agree to cookies being placed on his/her device, the can be blocked by configuring the web browser accordingly. Information on how to do this can be found in the help files of the web browser the User is using. However, if cookies from the Website are blocked, the Controller cannot guarantee its correct functioning.

If the User agrees to cookies being placed on their device, but would like to delete them after visiting the website, information to this effect can be found in the help files of the Internet browser the User is using.

# D. Google AdWords (cookies)

Google AdWords uses the technology of "cookies", which are text files placed on your device, to enable the website to evaluate the correctness and effectiveness of its advertising activities using the AdWords network.

Google collects the data obtained from the placement of cookies on the User's device on its servers and uses this information to create reports and provide other services relating to traffic and Internet usage.

Google may also transfer this information to third parties where it is required to do so by law or in the case in which such third parties process the information on Google's behalf.

These data are never combined with the reported data referred to in Part III of the Policy and only provide material for statistical analysis and mechanisms for correcting system errors.

With the User's consent, the Website also uses the Google AdWords enhanced conversion files referred to in section B above.

If the User does not agree to cookies being placed on his/her device, the can be blocked by configuring the web browser accordingly. Information on how to do this can be found in the help files of the web browser the User is using. However, if cookies from the Website are blocked, the Controller cannot guarantee its correct functioning.



If the User agrees to cookies being placed on their device, but would like to delete them after visiting the website, information to this effect can be found in the help files of the Internet browser the User is using.

### E. Pixel Facebook

Pixel Facebook uses "cookie" technology, i.e. text files placed on a visitor's device, to enable the Website to analyse the sources of traffic and how visitors use the Website. Pixel Facebook collects data on its servers from the placement of cookies on devices and uses this information to create reports and provide other services related to Internet traffic and usage. Pixel Facebook may also pass on this information to third parties if it is obliged to do so by law or where such third parties process such information on behalf of Facebook.

This data is never combined with the data provided by the user and is only material for statistical analysis and system error correction mechanisms. This data is not disclosed to third parties.

If the User does not agree to cookies being placed on their device, they can be blocked them configuring the web browser accordingly. Please refer to your browser's help files for information on how to do this. Unfortunately, if Pixel Facebook cookies are blocked, the Controller cannot guarantee the correct operation of the Website. If the User agrees to Pixel Facebook cookies being placed on their device, but would like to delete them after visiting the Website, they can do so without any risk and information on how to do so can be found in the help files of the Internet browser.

### F. Social Plugins

Social Plugins are used on the Website. Plugins can be recognised by the fact that they are marked with the respective logo of the respective operator.

These plugins may be used to send information, which may contain personal data, to and may be used by the relevant operator. To activate the desired social plugin, click on the corresponding button. We are then redirected to a tab which asks us to click on the respective plugin again to use the services of the respective operator. The company does not collect any personal data via plugins.

The Company is not responsible for the standard and privacy policies of portal operators. We therefore recommend that you review each of them yourself and decide for yourself whether you wish to entrust them with your personal data.

To find out what specific data is collected by individual operators and how they are used, please refer to the privacy policies of the respective operator. Please note that if you are logged in to Facebook at the same time, Facebook may identify you as a visitor to a specific page.

### V. Recipients of the User's Personal Data

Users' personal data may be transferred to service providers used by the Controller in the conduct of its business. The providers of these services process the personal data entrusted to them by the



Controller only to the extent and for the purpose strictly indicated by the Controller. These include, for example, suppliers providing the Controller with IT services for the technical operation of the Website and the Shop or suppliers of marketing systems, couriers processing orders placed by the User, as well as entities providing accounting and legal services to the Controller. The Controller may also, in justified cases, provide personal data to entities with personal or capital relations with the Controller, if this proves necessary for the Controller to be able to perform the service requested by the User.

The Controller shall ensure that appropriate agreements for the entrustment of the processing of the Users' personal data have been or will be concluded with all the aforementioned entities, specifying the obligations of the service providers when processing the Users' personal data.

In specific situations in which the applicable legislation requires the Controller to make the collected User data available to authorised public authorities, the Controller will provide such data to the necessary extent justified by the authority's request.

In doing so, the Controller guarantees that Users' personal data will not be transferred to countries outside the European Economic Area or to international organisations.

### VI. Retention Period of Users' Data

The User's personal data processed on the basis of the consent given by the User (Article 6, section 1, letter a) of the GDPR) will be processed by the Controller until the consent is withdrawn or the purpose for which the consent was given is fulfilled (e.g. responding to an enquiry via the contact form, withdrawal by the User of consent to receive commercial information by electronic means, completion of the recruitment process in which the job candidate participated).

The User's personal data processed for the purpose of performing the contract with the User (Article 6, section 1, letter b) of the GDPR) will be processed until the performance of the contract or the end of the contract, and then until the expiry of the limitation period for claims arising from that contract or until the investigation or defence of the Controller's claims arising from the contract is lawfully concluded (Article 6, section 1, letter f) of the GDPR).

The User's personal data processed for the purpose of fulfilling a legal obligation incumbent on the Controller (Article 6, section 1, letter f) of the GDPR) will be processed until the Controller's mandatory retention of such data has expired (e.g. retention of tax records until the statute of limitations for tax liabilities has expired).

# VII. Users' Rights in Relation to the Processing of Their Personal Data

# A. Right of Withdrawal of Consent

The User has the right to withdraw the consent given for the processing of his/her personal data at any time, if this consent constitutes the legal basis for the processing of his/her personal data (Article 6, section 1, letter a) of the GDPR). Consent for data processing may be withdrawn by sending the Controller a declaration indicating such a wish, e.g. in the form of an e-mail message. The withdrawal



of consent shall have effect from the moment of receipt of the above declaration of withdrawal of consent by the Controller and shall not affect the lawfulness of the processing of the User's personal data carried out by the Controller before the withdrawal of consent.

Legal basis: Article 7, section 3 of the GDPR

### B. Right to Request Access to Data

The User has the right to receive confirmation from the Controller as to whether their personal data is being processed and, if this is the case, they the right to:

- a) gain access to their personal data;
- b) to be informed about: the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients of that data, the intended period of storage of the User's data or the criteria for determining that period, the User's rights under the GDPR and the right to lodge a complaint with a supervisory authority, the source of that data, automated decision-making, including profiling and the safeguards applied in connection with the transfer of such data outside the European Economic Area;
- c) obtain a copy of their personal data free of charge, whereby for each subsequent copy of the User's personal data, the Controller may request a fee reflecting the costs of its preparation.

Legal basis: Article 15 of the GDPR

# C. Right of Rectification

The User has the right to rectify and complete the personal data they have provided. The User can do this by requesting that this data be corrected (if incorrect) or completed (if incomplete). Legal basis: Article 16 of the GDPR

# D. Right to Erasure ("Right to be Forgotten")

The User has the right to request the deletion of all or a part of the data concerning them.

The User may request the deletion of his/her personal data if:

- a) the personal data is no longer necessary for the purposes for which it was collected or for which it was processed;
- b) the personal data are processed unlawfully;
- c) to object to the processing where it is based on the legitimate legal interest of the Controller;
- d) personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- e) personal data was collected in connection with the offering of information society services.

Despite a request for erasure of personal data in connection with the lodging of an objection (point c) above), the Controller may continue to process the User's personal data to the extent necessary for the purposes of establishing, asserting or defending claims, and to the extent necessary to comply with a legal obligation requiring processing under Union law or the law of a Member State to which the Controller is subject.

Legal basis: Article 17 of the GDPR



# E. Right to Restrict Data Processing

The User has the right to request the Controller to restrict the processing of their personal data, i.e. not to undertake any processing activities in relation to that data beyond the mere storage of the data, in the following cases:

- a) when they question the accuracy of their personal data, for a period of time to allow them to verify the accuracy of the data;
- b) when the processing of the data is unlawful, but the User objects to the erasure of the data, requesting instead the restriction of the processing;
- c) when the User's personal data is no longer necessary for the purposes for which it was collected or used, but is needed to establish, assert or defend a claim;
- d) when the User has objected to the use of his/her data, in which case the restriction shall be for the time necessary to consider whether the protection of the interests, rights and freedoms of the User outweighs the interests pursued by the Controller in processing the User's personal data.

Legal basis: Article 18 of the GDPR

# F. Right to Data Portability to Another Controller

Where the User's personal data is processed by the Controller on the basis of the consent given by the User or for the purpose of entering into a contract with the User (Article 6, section 1, letter a) and b) of the GDPR), the User has the right to receive in a structured, commonly used readable format the personal data that they have provided to the Controller and have the right to send this personal data to another controller without hindrance from the Controller, provided that this is technically possible. Legal basis: Article 20 of the GDPR

# G. Right to Object to the Processing

The User has the right to object at any time to the processing of his/her personal data where the processing is based on the legitimate legal interest of the Controller (Article 6, section 1, letter f) of the GDPR). If the User's objection proves to be well-founded and the Controller has no other legitimate legal basis for processing the User's personal data, as well as a basis for establishing, asserting or defending his/her claims, the Controller shall delete the User's personal data against the use of which the User has raised an objection.

Legal basis: Article 21 of the GDPR

If, in the exercise of the aforementioned rights described above in points A-G, the User makes a request to the Controller, the fulfilment or refusal of the request will take place immediately, but no later than one month after receipt of the request. However, if due to the complexity of the request or the number of requests, the User will not be able to comply with the User's request within one month, it will be complied with within a maximum of a further two months after informing the User of the need to extend this period.

# H. Right to Lodge a Complaint with a Supervisory Authority



If the User considers that the right to personal data protection or other rights granted to the User under the GDPR have been violated, the User has the right to lodge a complaint to the supervisory authority, which in Poland is the President of the Office for Personal Data Protection.

Legal basis: Article 77 of the GDPR

# VIII. Voluntary Provision of Personal Data

The provision of personal data by the User is in any case voluntary, but necessary to fulfil the purposes listed in point III of this Policy. The consequence of the User's failure to provide the data required for the aforementioned purposes will be that the Controller will not be able to carry out the aforementioned activities.

### IX. Possibility of Profiling of Users' Personal Data by the Controller.

As a general rule, Users' personal data will not be subject to profiling or the basis for automated decision-making in other ways.

# X. Change in Privacy Policy

If it is necessary to update the information contained in this Privacy Policy or if it is necessary to ensure that it complies with applicable laws or the technological conditions of operation of the Service, this Privacy Policy may be amended. Users will be informed of all changes to the Privacy Policy through a notice displayed on the Website.