

Privacy Policy of Sery ICC Pasłek Sp. z o.o. based in Pasłek, Poland

Pursuant to Art. 13 of the Regulation 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), we hereby inform you that:

Data Controller is Sery ICC Pasłek Sp. z o.o. with headquarters in Pasłek, ul. Dworcowa 9, 14-400 Pasłek, KRS number 0000068213, NIP 5780014114, registered in the District Court in Olsztyn, VIII Commercial Division of the National Court Register.

Data Controller contact details are also available on the website <https://www.iccpaslek.pl>, e-mail address: recepcja@stolicasera.pl

Data Protection Officer is Mr Rębisz, contact details: tel. +48 608-880-819; e-mail address: iod@stolicasera.pl

In all matters related to the processing of your personal data by **Sery ICC Pasłek Sp. z o.o.** you can contact the **Data Protection Officer** through the e-mail address: recepcja@stolicasera.pl

Polityka prywatności zawiera zasady zbierania i wykorzystywania danych o Użytkowniku, w tym przy składaniu przez Użytkownika zapytań oraz zamówień na oferowane przez **Sery ICC Pasłek Sp. z o.o.** towary i usługi.

Our **main purpose** is to provide the **User of the webpage**: <https://www.iccpaslek.pl> and in other social media with the **protection of his/her privacy** at a level at least corresponding to the standards specified in applicable legal provisions, in particular in the Act of July 18, 2002 on the provision of services by electronic means (Journal of Laws of 2019, item 123) and in the of the Regulation 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) - GDPR (Journal of Laws UE L 119, p. 1).

The **Privacy Policy** includes information on how we use the personal data provided by the User, how we protect them and what are the rights and obligations of the User.

Definitions:

- **Data Controller** – company **Sery ICC Pasłek Sp. z o.o.** based in Pasłek, Poland which alone or jointly with others determines the purposes and means of the processing of personal data.
- **GDPR** – Regulation 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.
- **Policy** – this Privacy Policy.
- **Personal data** in accordance with the GDPR definition – any information relating to an identified or identifiable natural person, who can be identified, directly or indirectly, in particular by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, as well as to a device IP, location data, an online identifier or information collected through cookies. The catalog of personal data is not closed.
- **User** – any natural person visiting the Website.
- **Website** – a website run by the Controller at: <https://www.iccpaslek.pl>

- **Cookies** - these are small text files installed on the device of the User browsing the Cookie Service, they collect information that facilitates the use of the website - e.g. by remembering the User's visits to the Website and activities performed by him/ her.

Purpose and legal basis for data processing on the website

In order to provide services in line with the business profile, Sery ICC Pasłek Sp. z o.o. processes your personal data for various purposes, but always in accordance with the law. Below you will find the specific purposes of the processing of personal data along with the legal grounds.

Your personal data is processed by the **Controller**:

- in order to conclude and perform a service contract to which the data subject is a party, or to take action at the request of the data subject, before concluding the contract pursuant to art. 6 sec. 1 (b) GDPR;
- for marketing aimed for the potential and current customers for commercial and advertising purposes, in connection with the products and services offered by Controller - the legal basis for such data processing is consent - art. 6 sec. 1 (a) GDPR and the legitimate interest pursued by the Controller, art. 6 sec. 1 (f) GDPR, in this case the legitimate interest of the Controller is building relationships with customers;
- in order to confirm your identity, your data is processed on the basis of activities aimed at concluding a contract - art. 6 sec. 1 (b) GDPR and the legitimate interest of ADO - art. 6 sec. 1 (f) GDPR;
- in order to improve the services and business development, on the basis of data analysis in the systems, the administrator may offer new products and services, which is the legitimate interest of the Controller - art. 6 sec. 1 (f) GDPR;
- in order to keep records related to the GDPR, including, for example, a register of customers who have objected in accordance with the GDPR, the administrator processes the data because the provisions of the GDPR impose certain documentation obligations to demonstrate compliance and accountability, e.g. if you raise an objection to the processing of your personal data for marketing purposes, the administrator must know to who not to send direct marketing to. The basis for such processing is the legal obligation - art. 6 sec. 1 (c) GDPR and the legitimate interest of the Controller - art. 6 sec. 1 (f) GDPR;
- in order to establish, investigate or defend against claims, we pursue the legitimate interest of the Controller - art. 6 sec. 1 (f) GDPR, which is the possession of personal data that will allow to establish, pursue or defend against claims of customers and third parties;
- for archival and evidentiary purposes, the Controller processes personal data for the purposes of securing information that may be used to prove facts of legal significance, in this way the administrator performs its legitimate interest - art. 6 sec. 1 (f) GDPR;
- in order to administer the website, the data are automatically saved in the so-called logs, each time you use the Controller's website. The legal basis for such data processing is the legitimate interest of the Controller in the form of data transmission requested by your browser - art. 6 sec. 1 (f) GDPR.

In addition, the **Data Controller** processes personal data through:

Telephone contact

If you contact the administrator by phone in matters that are not related to the concluded contract or services provided, the administrator may request your personal data only if it is necessary to settle the matter to which the contact is related with. In this case, the legal basis is the legitimate interest of the Controller, consisting in the need to settle the reported case related to his business activity - art. 6 paragraph 1 (f) GDPR.

E-mail and traditional correspondence

If you send any correspondence to the Controller via e-mail or traditional mail in matters that are not related to the concluded contract or services provided, your personal data contained in this correspondence are processed only for the purpose of communication and settling the matter to which the correspondence relates. Correspondence is stored in a way that ensures the security of personal data contained therein. In this case, the legal basis is the legitimate interest of the Controller consisting in conducting correspondence addressed to the Controller in connection with his business activity - art. 6 paragraph 1 (f) GDPR.

Contact form

Through the Website, it is possible to contact the administrator using the electronic contact form. Using the form requires providing personal data necessary to contact you and answer the inquiry. You may also provide other data in order to facilitate contact or handling the inquiry. Providing data marked as mandatory is required in order to accept and handle the inquiry, and failure to do so results in the inability to handle/ answer it. Providing any other data is voluntary.

Cookies

The administrator uses the so-called service cookies primarily to provide the User with services provided electronically and to improve the quality of these services. Therefore, the administrator and other entities providing analytical and statistical services to him use cookies by storing information or accessing information already stored in the User's end device (computer, telephone, tablet, etc.).

Cookies fulfill many functions on the website, including:

- are used to authenticate users and prevent unauthorized use of the customer panel. Therefore, they are used to protect the user's personal data from access by unauthorised persons;
- they are used to make the website work efficiently and to use the functions available on it, which is possible, among other things, by remembering the settings between subsequent visits to the website. Thanks to them, you can efficiently navigate the website and individual subpages;
- they store information about how the visitors use the website, e.g. which subpages are displayed most often. They also make it possible to identify errors displayed on some subpages. Cookies used to save the so-called "Session state" therefore help to improve services and increase the browsing experience;
- are used to analyze how users use the website (how many people open the website, how long they stay on it, which content is of the greatest interest, etc.). Thanks to this, it is possible to constantly improve the website and adapt its operation to the preferences of users. In order to track activity and create statistics, we use Google tools, such as Google Analytics;

You can agree or refuse consent to the use of cookies through the settings of your browser. If your browser accepts certain cookies, you consent to the use of these cookies in accordance with the relevant provisions of Polish law. If you do not wish to use cookies when browsing the website, you can change the settings in your web browser - completely block the automatic handling of cookies or request notification each time cookies are placed on the device. The settings can be changed at any time.

In the Mozilla Firefox browser - the browser allows you to indicate that the user does not want to be tracked at all or it is possible to delete individual cookies of individual websites. In the "Tools" menu, select "Options" and the "Privacy" tab in them.

In Microsoft Internet Explorer - in the "Tools" menu, select "Internet Options" and the "Privacy" tab in them. A special slider can regulate the general level of privacy or use the "Websites" button to manage the settings of individual websites.

In the Google Chrome browser - in the menu hidden under three horizontal lines in the upper right corner of the browser, select "Tools" and then "Clear browsing data". In addition to the ability to clear cookies, there is a "More information" link that leads to a detailed description of the browser's privacy functions.

In the Opera browser - with the "Opera" button in the upper left corner, select the menu, then "Settings" and then "Clear browsing history". In addition to the option to delete already set cookies, there is also a "Manage cookies" button leading to more advanced options for individual sites.

In Apple Safari browser - in the "Safari" menu, select "Preferences" and in them the "Privacy" tab. There are numerous options for cookies.

In mobile phones, tablets and other mobile devices - each phone model can support this function in a different way. Therefore, we encourage you to read the privacy options in the documentation on the website of the manufacturer of the mobile device.

Disabling or limiting the use of cookies may cause quite serious difficulties in using the website, e.g. in the form of a longer page loading period, restrictions on the use of functionalities, restrictions on liking the page on Facebook, etc.

To whom and under what circumstances we may transfer your data

We may transfer your data to authorities or institutions and entities authorized to receive such information that help us run our website and application, e.g. they support us in marketing campaigns, service our software, provide services, provide support and operation of our tools and teleinformation systems, etc.

In such cases, the amount of data transferred is limited to the required minimum. The transfer may take place on the basis of a concluded contract and only to those who guarantee that your data will be adequately protected and processed in accordance with the law.

Data processing period

The period of data processing by the Controller depends on the type of service provided and the purpose of processing. The period of data processing may result from the provisions, when they constitute the basis for processing. In the case of data processing on the basis of the legitimate interest of the Controller, the data is processed for a period enabling the implementation of this interest or until an effective objection to data processing is filed. If the processing is based on consent, the data is processed until the consent is withdrawn. Withdrawal of consent for the processing of personal data does not affect the lawfulness of the processing carried out on the basis of your consent before its withdrawal. When the basis for processing is necessary to conclude and perform the contract, the data is processed until its termination. The data processing period may be extended if the processing is necessary to establish or pursue claims or defend against claims, and only after this period and to the extent that would be required by the provisions of the law.

Data subject's rights

Pursuant to the GDPR, you are entitled to the following rights:

- the right to access to your data;
- the right to demand a correction of your data;
- the right to demand that your personal data are removed;
- the right to request to limit the processing of your personal data;
- the right to submit a complaint regarding the processing of your personal data;
- the right to transfer your data.

Data Controller, without undue delay - and within one month from receiving the request, will provide you with information about the actions taken in connection with your request. If necessary, the monthly period may be extended by another two months due to the complexity of the request or the number of requests. In any case, the **Data Controller** will inform you about such extension within one month from receiving the request, stating the reasons for the delay.

You can withdraw your consent for the processing of your personal data at any time. Withdrawal of the consent to the processing of personal data does not affect the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal.

You have the right to object to the processing of data for marketing purposes, if the processing takes place in connection with the legitimate interest of the Data Controller, and - for reasons related to your particular situation - in other cases where the legal basis for data processing is a legitimate interest of the Data Controller (e.g. in connection with the implementation of analytical and statistical purposes).

Complaint to the supervisory authority

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint to the President of the Personal Data Protection Office [*pl. Prezesa Urzędu Ochrony Danych Osobowych*], ul. Stawki 2, 00-193 Warsaw.

Automated decision making and profiling

Your data will not be used for automated decision-making, which is based solely on automated processing, including profiling, and causes legal effects for you or similarly significantly affects you.

Amendments to the Privacy Policy

The new Privacy Policy has been adopted and is effective from March 28, 2022. The Privacy Policy will be reviewed on an ongoing basis and updated as necessary.