Privacy Policy

Sawaryn and Partners sp. k.

Version 1.0 | effective from 15 October 2026

In this Policy, we explain what personal data we collect, why, on what basis and for how long we retain it. We also describe to whom we disclose it and what rights you have in relation to us.

This Policy covers the use of the website www.sawaryn.com and the processing of data in connection with the provision of legal assistance and the running of our law firm.

1. Who is the controller of your data?

The data controller for your personal data is Sawaryn i Partnerzy, a limited partnership with its registered office in Warsaw, at ul. Warecka 4/6, flat 6, 00-040 Warsaw, entered in the National Court Register under number 0000708957, Tax Identification Number (NIP) 7010789820, REGON 368988905.

Our second office is located in Bielsko-Biała, ul. S. Sempołowskiej 19, 43-300 Bielsko-Biała.

We have not appointed a data protection officer. For all matters relating to your data, please write to kancelaria@sawaryn.com or to our registered office address.

2. When do we act as a joint controller with another company?

We maintain the firm's profiles on Facebook and LinkedIn. Both platforms provide us with statistics regarding the audience of our profiles. In this respect, we are joint controllers together with Facebook (Meta Platforms Ireland Limited) and LinkedIn (LinkedIn Ireland Unlimited Company) within the meaning of Article 26 of the GDPR.

This joint control relates exclusively to audience statistics. The key terms of the arrangements and information on how the platforms process your data can be found in the agreements provided by each of them:

- Facebook: www.facebook.com/legal/terms/page_controller_addendum
- LinkedIn: legal.linkedin.com/pages-joint-controller-addendum

Regardless of the division of roles, you may address any request concerning your data to us at kancelaria@sawaryn.com.

3. What data do we process and where do we get it from?

We receive most of the data directly from you: when you write to us via the form, start a chat, subscribe to the newsletter or enter into a contract with us.

We obtain some data from other sources. This applies in particular to data relating to individuals featured in the case files we maintain and to the contact persons of our business partners. Such data comes from: public registers (KRS, CEIDG), case files and documents, information provided by a client or business partner, and social media platforms.

If we have obtained your data from a source other than yourself, we will inform you of this in accordance with Article 14 of the GDPR: we will specify the source of the data (Article 14(2)(f) of the GDPR) and the categories of data (Article 14(1)(d) of the GDPR). We do this upon first contact, or at the latest one month after obtaining the data. This obligation may be limited by professional secrecy, which we are bound to uphold.

We primarily process: identification data, contact details, data relating to the role in the case, the content of correspondence, and, in the case of contracts, also billing data.

We process special categories of data referred to in Article 9(1) of the GDPR only where this is necessary for the purposes of the case in question. The legal basis in such cases is Article 9(2)(f) of the GDPR, namely the establishment, exercise or defence of legal claims.

4. Why do we process your data, on what legal basis and for how long?

Each row of the table describes one purpose for one group of individuals.

Purpose	Legal basis	How long we retain the data
We respond to enquiries submitted via the contact form and conduct correspondence aimed at concluding a legal assistance agreement	Article 6(1)(b) of the GDPR	12 months from the last contact
We handle chat conversations on the website and respond to enquiries	Article 6(1)(f) of the GDPR Our legitimate interest: handling enquiries submitted by individuals interested in our services.	12 months from the last contact
We send out a newsletter containing legal updates and information about our services	Article 6(1)(a) of the GDPR; electronic channel - Article 398(2) of the Electronic Communications Act	Until consent is withdrawn, followed by 3 years for the purposes of providing evidence of its granting and withdrawal
We provide information about our services to individuals on whose behalf we have handled cases	Article 6(1)(f) of the GDPR; electronic channel - Article 398(2) of the Electronic Communications Act Our legitimate interest: direct marketing of our own services to individuals with whom the firm has had a relationship.	24 months from the conclusion of the case
We measure how the website is used and the effectiveness of our marketing activities, including by recording sessions and using heatmaps	Article 6(1)(a) of the GDPR; storage and retrieval on the device - Article 399 of the Electronic Communications Act	for the lifetime of the files stored on your device, as specified in the Cookie Policy
We carry out remarketing and personalise adverts on the Google advertising network, and we measure conversions, including telephone calls	Article 6(1)(a) of the GDPR; storage and retrieval on the device - Article 399 of the Electronic Communications Act	for the lifetime of the files stored on your device, as specified in the Cookie Policy
We identify your region based on your IP address in order to provide the correct language	Article 6(1)(f) of the GDPR; storing a file on your device is necessary to provide the	For the duration of your visit to the website - the language cookie is a

Purpose	Legal basis	How long we retain the data
version of the website	language version you have requested, so it does not require consent - Article 399(2) of the Electronic Communications Act Our legitimate interest: to provide the user with the version of the website corresponding to their region.	session cookie and is deleted when you close your browser
We embed YouTube videos in our articles	Article 6(1)(a) of the GDPR; storage and retrieval on the device - Article 399 of the Electronic Communications Act	for the lifetime of the files stored on your device, as specified in the Cookie Policy
We provide legal assistance, manage and store case files	Article 6(1)(b) of the GDPR	10 years from the conclusion of the case
We process the data of persons other than the client who appear in the case files - opposing parties, witnesses and third parties	Article 6(1)(f) of the GDPR Our legitimate interest: providing legal assistance to the client and establishing, pursuing and defending claims.	10 years from the conclusion of the case
We maintain ongoing correspondence and telephone contact with clients and business partners	Article 6(1)(f) of the GDPR Our legitimate interest: maintaining ongoing contact necessary for the performance of the contract concluded with the entity that the person represents.	for the duration of our cooperation with the represented entity, and thereafter until the expiry of the limitation period for claims arising from the contract
We carry out accounting, issue and retain invoices and accounting records	Article 6(1)(c) of the GDPR	5 years from the end of the calendar year in which the tax payment deadline expired
We establish, pursue and defend ourselves against claims relating to the services we provide	Article 6(1)(f) of the GDPR Our legitimate interest: establishing, pursuing and defending claims.	6 years
We apply financial security measures: we identify and verify identity, determine ownership structure, assess risk, monitor business relationships and - where necessary - report to the General Inspector of Financial Information	Article 6(1)(c) of the GDPR	5 years from the end of the business relationship or from the date of an occasional transaction, with the possibility of extension pursuant to the provision
We are recruiting for a specific post and assessing candidates	Article 6(1)(c) of the GDPR	3 months from the end of the recruitment process; where consent has been given to participate in

Purpose	Legal basis	How long we retain the data
		future recruitment processes - 12 months from the date of consent, with the option to withdraw consent at any time
We manage the firm's profiles on Facebook and LinkedIn and our YouTube channel, publish content and handle interactions	Article 6(1)(f) of the GDPR Our legitimate interest: building the firm's brand recognition and communicating with our audience.	Content and interactions remain on the platform and are subject to its terms and conditions; on the firm's side, correspondence with users is retained for 12 months from the last contact, whilst aggregated statistics that do not contain personal data are retained indefinitely

You may object at any time to processing based on our legitimate interest. We discuss this in section 9.

5. Does the website use artificial intelligence?

No. The chat function available on the website provides pre-prepared response options and does not engage in free-flowing conversation. It is not an artificial intelligence system within the meaning of Article 3(1) of Regulation 2024/1689 (the AI Act), and therefore the information obligation under Article 50 of that Regulation does not apply to us in this context.

6. Who do we share your data with?

We use service providers who process data on our behalf. We list them by name below, together with the role they perform.

Category	Entity	Role
Website hosting provider	PAT15.NET P. KŁODA SPÓŁKA JAWNA (ProudHost.eu consortium)	Processor
Email, file and case management system provider	Microsoft (Microsoft 365)	Processor
accountancy firm	INAC sp. z o.o.	Processor
newsletter and chat provider	GetResponse S.A.	Processor
providers of analytics and advertising tools	Google Ireland Limited, Microsoft (Clarity)	Processor
consent mechanism provider	Usercentrics (Cookiebot)	Processor

Category	Entity	Role
provider of form protection against bots	Cloudflare (Turnstile)	Processor
provider of geolocation based on IP address	DB-IP	Processor
social media platforms	Meta Platforms Ireland Limited, LinkedIn Ireland Unlimited Company	joint controller for audience statistics
public authorities	The General Inspector of Financial Information and other authorities authorised under the relevant legislation	separate controller

Your data may also be disclosed to authorities authorised by law and - where professional secrecy applies - only to the extent permitted by law.

7. Do we transfer data outside the European Economic Area?

Yes. Some of our suppliers belong to corporate groups based in the United States.

Recipient	Country	Basis for transfer
Google Ireland Limited	United States	Article 45 of the GDPR - European Commission Implementing Decision 2023/1795 (EU-US Data Privacy Framework)
Microsoft	United States	Article 45 of the GDPR - European Commission Implementing Decision 2023/1795 (EU-US Data Privacy Framework)
Cloudflare	United States	Article 45 of the GDPR - European Commission Implementing Decision 2023/1795 (EU-US Data Privacy Framework)

The transfer is based on European Commission Implementing Decision 2023/1795 of 10 July 2023, which recognises an adequate level of data protection under the EU-US Data Privacy Framework. In addition, our contracts with suppliers contain standard contractual clauses.

8. How do we protect your data?

We implement technical and organisational measures commensurate with the risk. These include: role-based access control, two-factor authentication, transmission encryption, authorisations for processing and confidentiality obligations, a password policy, and clean desk and clean screen policies, as well as a data breach response procedure.

All persons with access to data act on the basis of authorisation and are bound by a duty of confidentiality. Irrespective of this, we are bound by professional secrecy.

9. What are your rights?

You have the right to:

- access your data and receive a copy of it (Article 15 of the GDPR),
- rectify your data (Article 16 of the GDPR),
- erase your data (Article 17 of the GDPR),
- restrict processing (Article 18 of the GDPR),
- data portability (Article 20 of the GDPR),
- to object to processing based on our legitimate interests (Article 21 of the GDPR); in the case of direct marketing, the right to object is unconditional,
- withdrawal of consent at any time, where processing is based on consent (Article 7(3) of the GDPR).

Withdrawing your consent does not affect the lawfulness of any processing we carried out prior to its withdrawal. You can withdraw your consent to receive the newsletter via the link in each message or by emailing kancelaria@sawaryn.com.

Please submit your request to kancelaria@sawaryn.com or in writing to our registered office address. We will respond within one month. If the matter is complex, we may extend this period by two months - in which case we will inform you of the reason. If we are unable to identify you, we will ask for further information.

The right to erasure may be restricted where processing is necessary to comply with a legal obligation or to establish, exercise or defend legal claims. This applies in particular to case files, accounting records and documentation required under anti-money laundering regulations.

You may also lodge a complaint with the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.

10. Is providing data compulsory?

Providing your data is voluntary, but without it we will be unable to carry out certain actions. This applies to the following data: your email address in the contact form and in the newsletter; identification details when entering into a legal assistance agreement.

Consequences of not providing data: we will be unable to respond to your enquiry, send the newsletter or conclude a contract; in the case of AML obligations, we will be unable to enter into a business relationship.

11. Do we make automated decisions and do we carry out profiling?

We do not make decisions regarding you based solely on automated processing that would produce legal effects concerning you or similarly significantly affect you. We therefore do not apply Article 22(1) of the GDPR.

However, we do carry out profiling for marketing purposes: the advertising tools we use select advertising content based on your activity on the website. This only takes place once you have given your consent to the use of cookies, and you may withdraw this consent at any time.

12. Cookies

We use cookies and similar technologies on the website. Storing and retrieving information on your device, beyond what is necessary to provide the service you have requested, requires your prior consent - in accordance with Article 399 of the Electronic Communications Act of 12 July 2024.

We collect your consent via a banner displayed on your first visit. You can change your consent at any time by clicking on ‘Privacy Settings’ in the website footer.

A full list of cookies, including their purpose, provider and retention period, can be found in our Cookie Policy.

13. Minors

Our services and website are not directed at persons under the age of 16, and we do not knowingly collect their data.

14. Changes to the Privacy Policy

We may amend this Policy, for example, if legislation or the tools we use change. We publish each new version on the website, together with the date from which it takes effect and the version number.

We will notify you in advance of any changes that are relevant to you, rather than simply publishing the new version. Previous versions are available on request at kancelaria@sawaryn.com.

Version 1.0. Effective from 15 October 2026. Previous versions are available on request by emailing kancelaria@sawaryn.com.