

## **Privacy and Cookies Policy of [www.sawaryn.com](http://www.sawaryn.com)**

### **§ 1. Definitions**

1. Words in this Privacy Policy that begin with a capital letter have the following meanings:
  - 1) **Privacy Policy** - this document,
  - 2) **RODO (GDPR)** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (Official Journal of the European Union No. L 119/1 of 4.5.2016),
  - 3) **Data Controller** - Sawaryn and Partners sp. k. with its registered office in Warsaw (00-040), at ul. Warecka 4/6 lok. 6, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register. 0000708957; NIP: 7010789820; REGON: 368988905,
  - 4) **Website** – means the website at [www.sawaryn.com](http://www.sawaryn.com), owned by Data Controller,
  - 5) **Regulations** – Regulations of the Website to be found at: [www.sawaryn.com](http://www.sawaryn.com)
  - 6) **Services** - services provided by the Data Controller through the Website, described in detail in the Regulations,
  - 7) **User** - any natural person visiting the Website or using one or more Services or functionalities described in the Regulations.
2. Terms capitalized and not defined herein shall have the meaning given to them in the Regulations.

### **§ 2. General information**

1. The Data Controller respects the right to privacy of the Website Users. In particular, the Data Controller takes care of the protection of their personal data and applies appropriate organisational and technical solutions to prevent third parties from interfering with the privacy of Users. These actions are aimed at ensuring the User the sense of full security at a level appropriate to the applicable law, in particular the RODO (GDPR).
2. This Privacy Policy sets out the principles of privacy and the processing of Users' personal data based on the RODO (GDPR), as well as on national data protection legislation. This Privacy Policy also constitutes the Data Controller's information obligation as set out in Articles 13 and 14 of the RODO (GDPR).
3. The Data Controller does not make automated decisions or profiling with regard to Users' personal data.

### **§ 3. Personal Data Controller**

1. The Data Controller of Users' personal data using the Website is Sawaryn  
  
i Partnerzy spółka komandytowa with its registered office in Warsaw (00-040) at ul. Warecka 4/6 lok. 6, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register. 0000708957; NIP: 7010789820; REGON: 368988905.
2. The Data Controller determines the scope and purposes of Users' personal data.
3. You can contact the Data Controller as follows:
  - a) by electronic means at the e-mail address: [kancelaria@sawaryn.com](mailto:kancelaria@sawaryn.com),

- b) in writing to the address: Sawaryn i Partnerzy sp.k., ul. Mickiewicza 19/7a, 43-300 Bielsko-Biała.

#### **§ 4. Scope, purposes and duration of personal data processing**

1. The Data Controller collects and processes Users' personal data to the following extent:
  - a) **data concerning use of the Website:** in particular IP address, location data, data about the User's device used to access the Website,
  - b) **data on the use of Services via the Website by the User,** such as: name, surname, e-mail address, telephone number, User's company name,
  - c) **data concerning use of the Website recorded in cookies,** such as: history of clicks, navigation or browsing, data concerning preferences or behaviour while browsing the Website,
  - d) other data provided by Users in connection with using the Website Services.
2. Personal data are processed by the Data Controller for the following purposes:
  - a) to perform an agreement of which the data subject is a party or to take action at the request of the data subject prior to entering into an agreement, in particular with regard to the User's use of the Services through the Website (Article 6(1)(b) RODO (GDPR)),
  - b) to comply with the Data Controller's obligations arising from the law (legal basis: Article 6(1)(c) of the RODO(GDPR)), in particular for accounting and billing purposes,
  - c) to pursue the Data Controller's legitimate interests, in particular for archiving, evidential, statistical and reporting purposes, to file claims or defend against claims (legal basis: Article 6(1)(f) RODO (GDPR)),
  - d) in other cases, the data will be processed only on the basis of the previously given consent, to the extent and for the purpose expressed therein (legal basis: Article 6(1)(a) RODO (GDPR)), If Users give their consent to receive marketing messages to their e-mail address, the legal basis will also be Article 10 of the Law of 18 July 2002 on the provision of electronic services and Article 172 of the Law of 16 July 2004. - Telecommunications Law.
3. The Data Controller shall process personal data for the period necessary to realise the purposes for which they were collected, i.e:
  - a) in terms of fulfilling the legal obligation incumbent on the Data Controller for the period and to the extent required by law;
  - b) in case personal data are processed for the purpose of performance of a contract, they shall be processed for the time necessary for its performance and to prove its correctness, i.e. the period of prescription for claims or the period of prescription for tax liabilities;
  - c) in case personal data will be processed in order to realize the legitimate interests of the Data Controller mentioned above - for the period until realization of these interests or to object to such processing,
  - d) in case personal data will be processed on the basis of consent - until withdrawal of such consent.

To the extent that the data are processed on the basis of a separate consent of the Users, they have the right to withdraw their consent at any time. However, this will not affect the legality of data processing that was carried out before its withdrawal.

## **§ 5. Sharing the Users' personal data**

1. Personal data may be made available by the Data Controller to the following entities:
  - a) partners, employees, associates of the Data Controller,
  - b) Entities cooperating with the Data Controller such as: accountants, IT service providers, banks, shipping agents, translators, appraisers, experts, tax advisors,  
  
as well as other contractors, whose services are necessary for the  
  
Data Controller to properly conduct its business activity, and also authorized employees or associates of the aforementioned entities,
  - c) entities that analyse data in order to personalise advertisements, develop remarketing campaigns, being independent data controllers in this regard,
  - d) entities providing tools for the analysis, optimization and efficient operation of the Data Controller's services, being independent data controllers in this regard,
  - e) public authorities, insofar as they are authorised to do so by the applicable legal provisions (upon request of the said authorities).
2. The Data Controller shall not transfer or authorise the transfer of personal data outside the EEA unless it takes the measures necessary to ensure that the transfer complies with the RODO (GDPR). These measures may include, in particular, the transfer of personal data to a recipient in a country which, in accordance with a decision of the European Commission, provides adequate protection for the personal data.

## **§ 6. Data subjects' rights**

Data subjects have the right to:

- a) have an access to the content of their personal data,
- b) have an opportunity to rectify (amend) or complete their data,
- c) delete their personal data ('right to be forgotten'), unless the processing is carried out in order to comply with an obligation arising from a provision of law or in the exercise of public authority or is necessary for the establishment, exercise or defence of claims,
- d) limit the scope of their personal data processing,
- e) transfer their personal data,
- f) raise objections against their personal data processing,
- g) withdraw consent to the processing of personal data, whereby the withdrawal of consent does not affect the lawfulness of personal data processing carried out on the basis of consent before its withdrawal,
- h) the right to lodge a complaint to the President of the Office for Personal Data Protection (address: Prezes Urzędu Ochrony Danych Osobowych ul. Stawki 2, 00-193 Warszawa, if the User becomes aware of the unlawful processing of their personal data.

## **§ 7. Cookies Policy**

1. Pursuant to Article 173 of the Law of 16 July 2004. Telecommunications Law (Journal of Laws of 2021, item 576, as amended), the Data Controller, informs that the Website uses cookies and automatically collects data contained in cookies.
2. Cookies are computer data, in particular text files stored in the User's device and intended for use on the Website.

Cookies contain, among others, the name of the website from which they come, the time of storage on the User's device and a unique number. Cookies are harmless to the computer and to the User and his data.

3. Cookies are used in order to:
  - a) facilitate the use of the Website by the User while browsing it;
  - b) later association of the User in case of reconnection of the Website with the device on which they are stored;
  - c) generation of statistics which help to understand how users of the Website use websites, which enables improving their structure and content;
  - d) adjustment of the content of the Website to specific preferences of the User and optimisation of use of the websites, adapted to the User's individual needs.
4. There are two main types of cookies used on the Website:
  - a) session cookies - constituting temporary files that are stored in the User's device until logging out, leaving the Website or switching off software (proper Internet browser);
  - b) persistent cookies - which are files stored in the User's device for the time specified in the parameters of cookies or until their deletion by the User.
5. The Website uses the following types of cookies:
  - a) necessary cookies enabling basic functions such as security, identity verification and network management;
  - b) functional cookies that collect data in order to remember individual choices of Users and provide them with better and more personalised experiences;
  - c) analytical cookies to help the Data Controller understand how Users interact with the Website, to detect errors and to provide better overall statistics.
6. Users may change their cookie settings at any time. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the Internet browser settings or inform on their presence in the User's device each time. Detailed information on the possibility and methods of using cookies is available in the software (web browser) settings used by the User.
7. Information about managing cookies in particular browsers can be found on websites dedicated to particular browsers:
  - a) Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>;
  - b) Internet Explorer: <http://support.microsoft.com/kb/196955/pl>,

- c) Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>,
  - d) Opera: <http://help.opera.com/Linux/12.10/pl/cookies.html>,
  - e) Safari: [http://support.apple.com/kb/HT1677?viewlocale=pl\\_PL&locale=pl\\_PL](http://support.apple.com/kb/HT1677?viewlocale=pl_PL&locale=pl_PL).
8. The Data Controller states that restricting the use of cookies may affect some of the functionalities available on the Website, and in extreme cases it may make it impossible to use the Website.