

## Privacy Policy

In compliance with Regulation 2016/679 of the European Parliament and of the Council (EU) 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 ("**GDPR**"), below we present information on our personal data processing activities.

1. Your personal data are controlled by SWS Kancelaria Prawna Strykowski Wachowiak Sp. k. with its registered office in Poznań (61-707), at ul. Libelta 26/2.
2. You can contact us by email: [kancelaria@sws.com.pl](mailto:kancelaria@sws.com.pl) or by phone +48 61 8513216.
3. Your personal data are processed according to the principles laid down in personal data protection provisions, including Regulation 2016/679 of the European Parliament and of the Council (EU) 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**") and Polish regulations adopted in connection with GDPR, notably the Act of 10 May 2018 on personal data protection.
4. The bases for personal data processing by the Controller:
  - article 6(1)(f) GDPR – for purposes related to legitimate interests pursued by the Controller, mainly the provision of services to clients, marketing of own services, analytical and statistical purposes, and also ensuring protection and security for employees and people on the premises covered by surveillance, as well as property;
  - article 6(1)(b) GDPR – for the purposes of taking steps at the request of the data subject prior to entering into a contract and for the purposes of performance of contracts concluded by the Controller;
  - article 6(1)(c) and article 6(1)(a) GDPR – for the purposes of recruitment of individuals pursuing employment or collaboration with the Controller;
  - article 6(1)(c) GDPR – with respect to compliance with legal obligations to which the controller is subject.
5. In regard to data processing by the Controller, you have the following rights:
  - you can obtain information about the manner and scope of our data processing and, additionally, a copy of your personal data;
  - you have the right to demand the rectification of your data (if entered incorrectly or changed), erasure (if there are no applicable grounds for their processing by the Controller) or restriction of processing;
  - you have the right to obtain your data, which you have provided to us, in a structured, commonly used and machine-readable format,
  - where your data are processed by the Controller on the grounds of a legitimate interest, you can object to such processing,
  - where your data are processed based on your consent, you have the right to withdraw your consent at any time, and this shall not affect the lawfulness of processing based on consent before its withdrawal.

If you believe that our processing of your data breaches your rights, you also have the right to lodge complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office (UODO) in Warsaw.
6. Providing your personal data is voluntary, but if you choose not to do so, we will not be able to enter into a contract with you or provide services to you. To the extent necessary for compliance with legal obligations to which we are subject, processing may be mandatory.

7. We may transfer your personal data to entities which collaborate with us within the scope of our services and those supporting our day-to-day business, including but not limited to entities providing us with accounting, IT services, certified auditors, lawyers, administration bodies, government services and courts. Personal data processed by us may be transferred to recipients in countries outside the European Union solely for the purposes of performing contractual obligations. Any other data transfer to a third country may take place after obtaining your consent.
8. Personal data shall be stored by the Controller:
  - with respect to data processing necessary for the performance of a contract – for the duration of that contract, and thereafter – up to the expiry of the limitation period for potential claims;
  - with respect to data processing necessary for compliance with legal obligations – for the period provided for in the applicable regulations;
  - with respect to data processing for the purposes of legitimate interests pursued by the Service Provider – for the period necessary to achieve those purposes or up to the time an objection is lodged.

## **COOKIES**

1. Cookies are computer data, notably text files, which are stored in the terminal equipment of the Service User for the purpose of using the Web Service. Cookies usually contain the name of the domain from which they originate, their lifetime on the terminal equipment and a unique number. Cookies are used to:
  - adapt the content of the Web Service to User preferences and optimise the browsing experience; in particular, these files allow the Web Service to recognise the User's device and display the website appropriately, in keeping with the individual preferences;
  - produce statistics to help understand how Service Users use the website, making it possible to improve its structure and content;
  - maintain session state of the Service User (after logging in) so that the User does not have to enter their login and password on every single sub-page of the Service.
2. There are two main types of cookies used within the Service: session cookies and persistent cookies. Session cookies are temporary files stored in the terminal equipment of the Service User which are deleted when they log out, leave the website or close the programme (internet browser). Persistent cookies are stored in the terminal equipment of the User for the time specified in the parameters of the cookie or until they are removed by the User.
3. The following types of cookies are used within the Service:
  - "essential" cookies, which make it possible to use the functions available within the Service, e.g. authentication cookies used for functions that require authentication in the Service;
  - cookies used to ensure security, e.g. cookies used to detect authentication fraud in the Service;
  - "performance" cookies, which make it possible to collect information on how the web pages of the Service are used;
  - "functional" cookies, which "remember" the settings selected by the User and User interface customisation, for example with respect to the language version or the User's region of origin, font size, appearance of the website, etc.;
4. In many cases, the software used to view websites (internet browser) allows for the storage of cookies in the User's terminal equipment by default. Service Users can change their cookie settings at any time. Specifically, the settings may be

changed in such a way as to block automatic cookie handling in browser settings or to notify the User each time cookies are placed in the User's device. Detailed information on managing cookies can be found in browser settings, e.g.: Internet Explorer, Mozilla Firefox, Chrome, Safari, Opera. Please be informed that if you block or restrict cookies, you may not be able to access some functionalities of the Web Service. The cookies placed on the terminal equipment of the Service User may also be used by the operator's affiliates.