

## Privacy policy

### 1. Data of Personal Data Controller

Please be informed that the controller of your personal data is GOŁĘBIEWSKI HOLDING sp. z o.o., with its registered office at ul. Wołomińska 125, Ciemne, 05-250 Radzymin, Poland, acting on the basis of an entry in the Register of Entrepreneurs kept by the District Court for the capital city of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under number 0000996308, NIP number 1251739335, hereinafter referred to as "TAGO". Contact with TAGO regarding personal data protection is possible by writing to the following e-mail address: [iod@golebiewski.pl](mailto:iod@golebiewski.pl).

### 2. Data Protection Officer

TAGO has appointed Data Protection Officer who will help you with all issues connected with personal data protection and provide response to any questions related to the processing of your personal data. You can contact the Officer using the following e-mail: [iod@golebiewski.pl](mailto:iod@golebiewski.pl).

### 3. Purpose and reasons for the processing of personal data

In order to render services in accordance with the profile of the activity, TAGO processes your personal data — for various purposes, however, always in accordance with the law. Personal data you have provided will be processed in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 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), referred to as GDPR. Your personal data are obtained in the process aiming at the conclusion of a contract. Below you will find a detailed list of purposes of personal data processing together with legal grounds.

A. In order to conclude and execute **the contract of sales, purchase, supply or any other contract related to the scope of business activity**, we process the following personal data:

- Name and surname;
- Address (street, house/apartment number, postal code, city);
- Telephone number;
- e-mail address;
- Data of the enterprise and Taxpayer Identification Number (NIP) (in case of issuing VAT invoices for the enterprise);
- Registration number of a vehicle belonging to the Client;
- Personal data of a driver collecting goods on behalf of the Client/Contracting Party;
- Basic details of a bank account to confirm the bank transfer;
- ID card/personal identification number (PESEL);
- Order number.

The legal basis for such data processing is art. 6 par. 1 letter b of GDPR based on which personal data can be processed if they are necessary to execute the contract or to take actions aiming at the conclusion of the contract.

B. In order to **investigate a complaint** we process the following personal data:

- Name and surname;
- Address (street, house/apartment number, postal code, city);
- Telephone number;
- e-mail address;
- or, alternatively, bank account number — if money is to be refunded.

The legal basis for such data processing is art. 6 par. 1 letter b of GDPR based on which personal data can be processed if they are necessary to execute the contract or to take actions aiming at the conclusion of the contract;

- C. In order to issue **an invoice and fulfil other obligations resulting from the tax law**, such as for instance storage of accounting documentation for a period of 5 years, we process the following data:
- Name and surname;
  - Business name;
  - Address of domicile or registered office;
  - Taxpayer Identification Number (NIP).

The legal basis for such data processing is art. 6 par. 1 letter c of GDPR based on which personal data can be processed if such processing is necessary for Personal Data Controller to fulfil obligations provided for by the law;

- D. In order to **provide safety to employees and persons staying in the territory of TAGO premises**, and to stop commen, we process the following data:
- Image from the closed circuit television;
  - Name and surname;
  - E-mail address;
  - Telephone number;
  - IP address;
  - ID card series and number;

The legal basis for such data processing is art. 6 par. 1 letter. f of GDPR based on which personal data can be processed if in this manner Personal Data Controller realizes its legally justified interest (in this case TAGO's interest is to provide safety to all persons staying on its premises). Data from CCTV are deleted after a maximum period of 30 days after the date of their registration, and in justified cases- after 12 months after the date of their registration.

- E. In order to create registers and filing systems connected with GDPR, including for instance the register of clients who objected to data processing in accordance with GDPR, we process the following data:
- Name and surname;
  - E-mail address.

GDPR imposes specific documentation obligations to manifest conformity and accountability. If you object to the processing of your personal data for marketing purposes, we have to know towards whom we cannot use direct marketing.

The legal basis for such data processing is art. 6 par. 1 letter. c of GDPR based on which personal data can be processed if such processing is necessary for Personal Data Controller to fulfil obligations provided for by the law (provisions included in GDPR); and art. 6 par. 1 letter f of GDPR based on which personal data can be processed if in this manner Personal Data Controller realizes its legally justified interest (in this case TAGO's interest is to have knowledge about persons who exercise their rights resulting from GDPR);

- F. In order to **establish, pursue or protect against claims** we process the following data:
- Name and surname (if surname has been provided) or the business name;
  - Address of domicile (if provided);
  - Personal identification number or taxpayer identification number (if provided);
  - e-mail address;
  - IP address;
  - Order number.

The legal basis for such data processing is art. 6 par. 1 letter f of GDPR based on which personal data can be processed if in this manner Personal Data Controller realizes its legally justified interest (in this case TAGO's interest is to hold personal data that enable to establish, pursue or protect against claims, including claims of clients and third parties).

G. For **analytical** purposes, i.e. in order to examine and analyse activity on the website of TAGO, we process the following personal data:

- Date and hour of visiting the site;
- Type of operating system;
- Approximate location;
- Type of the Internet browser used to browse the site;
- Time spent on the site;
- Visited sub-sites;
- Sub-site where the contact form was filled in.

The legal basis for such data processing is art. 6 par. 1 letter f of GDPR based on which personal data can be processed if in this manner Personal Data Controller realizes its legally justified interest (in this case TAGO's interest is to know the activity of clients on the website);

H. In order to **use cookies** on the website we process text information (cookies will be described in a separate paragraph). The legal basis for such data processing is art. 6 par. 1 letter a of GDPR which enables to process personal data on the basis of a voluntarily given consent (question about consent to use cookies pops up upon the first visit on the website);

I. In order to **administer the website** we process the following personal data:

- IP address;
- Date and time of the server;
- Information about the Internet browser;
- Information about the operating system.

— these data are automatically saved in the so-called server logs each time TAGO website is visited. Administration of the website without a server and such automatic saving would not be possible. The legal basis for such data processing is art. 6 par. 1 letter f of GDPR based on which personal data can be processed if in this manner Personal Data Controller realizes its legally justified interest (in this case TAGO's interest is to administer the website);

J. In order to handle contests we process the following personal data:

- Name and surname;
- Address (street, house/apartment number, postal code, city);
- Telephone number;
- e-mail address;
- Date of birth.

The legal basis for such data processing is art. 6 par. 1 letter a of GDPR which enables to process personal data on the basis of a voluntarily given consent.

#### 4. Cookies

1. Just like other entities, on its website TAGO uses the so-called cookies, i.e. short text information stored on a computer, telephone, tablet or other user's device. They can be read by our system, and by the systems of other entities the services of which we use (e.g. Facebook, Google).
2. Cookies have plenty of useful functions on the website that we have characterized below (if the information is insufficient, please contact us):
  - **ensuring security** — cookies are used for authentication of users and to prevent unauthorised use of the client panel. They are

to protect personal data of the user against unauthorized access;

- **impact on processes and effectiveness of the use of the website** — cookies are used to make the website work smoothly and to enable the use of its functions, which is possible as settings between individual visits on the website are saved. Owing to them the website and its sub-sites can be operated smoothly;
  - **status of the session** — cookies often contain information saying how visitor use the website, e.g. which subsites they display most often. They also enable identification of errors displayed on some subsites. Cookies used to record the so-called „status of the session” help improve services and comfort of browsing websites;
  - **maintenance of the status of the session** — if the client logs to its panel, cookies enable to sustain the session. It means that the visitor does not have to provide its login and password each time after going to another subsite, which makes using the website more comfortable;
  - **creation of statistics** — cookies are used to analyse how the visitors use the website (how many visitors open the website, how long they stay on the website, which information are most interesting for them etc.). In this way one can constantly improve the website and adjust it to users’ preferences. In order to track activity and create statistics we use Google tools such as Google Analytics; apart from reporting statistics of use of the website pixel Google Analytics can also help, along with some of the aforementioned cookies, in providing the user with more apt content in Google services (e.g. in Google browser) and in the whole network;
  - **use of social functions** — we have the so-called Facebook pixel on the website that enables to like our fanpage in this service while visiting the website. However, it is possible thanks to Facebook cookies we have to use.
3. Your Internet browser allows to use cookies on your device by default, therefore please give your consent to use cookies during your first visit. However, if you do not agree to the use of cookies while browsing the website you can change your settings in the browser and completely block automatic handling of cookies or demand information each time cookies are stored on your device. Settings can be change at any time.
  4. Having respect for the autonomy of all users visiting the website we feel obliged to inform you that blocking or limiting the use of cookies may cause quite serious obstacles in the use of the website, e.g. consisting in the need to log on each subsite, longer loading of the website, limitations in the use of functionalities, limitations in liking the page on Facebook etc.

## 5. **Right to withdraw consent**

1. If your personal data are processed on the basis of your consent, you can withdraw such consent at any time.
2. If you want to withdraw your consent to process your personal data, please follow the instructions in clause 11 sub-clause 5. If your personal data were processed on the basis of your consent, its withdrawal does not mean that the processing was illegal until then. In other words, we have the right to process your personal data until the moment you withdraw your consent and its withdrawal has no influence on conformity with the law.

## 6. **Requirement to provide personal data**

1. Submission of personal data is voluntary and depends on your decision. However, sometimes there is a requirement to provide specific personal data in order to meet your expectations as regards the provision of services.
2. In order to conclude a contract with TAGO, it is necessary to provide data listed in clause 3 A of this privacy policy.
3. If you want to receive an invoice for services it is necessary to provide all the data required by the tax law — otherwise we are not able to issue a correct invoice.
4. In order to be able to contact you via telephone in relation to issues connected with the completion of services it is necessary to provide the telephone number and e-mail address — otherwise we are not able to establish phone contact or send confirmation of your order.

## 7. **Automated decision making process and profiling**

Please be informed that we do not make automatic decisions, including decisions based on profiling.

## 8. **Recipients of personal data**

1. We use support of other entities in our activity, which often involves the necessity to provide them with personal data. Therefore, if necessary, we provide your personal data to lawyers cooperating with us, to companies handling fast payments, to our accountant, hosting company, to the company responsible for sending SMS messages, and to the insurance company (in case of the need to repair damage).
2. Besides it may happen that on the basis of relevant laws or decision of a competent authority we will have to provide your personal data to other entities or authorities.

#### **9. Providing personal data to third parties**

1. We use various popular services and technologies offered for instance by Facebook, Microsoft, Google or Zendesk. These companies are located outside the territory of the European Union, so, according to GDPR they are treated as third countries.
2. GDPR introduces some limitations in providing personal data to third countries as they do not apply European regulations and therefore personal data protection of EU citizens may be insufficient. Thus, each personal data controller is obliged to establish the legal basis related to the provision of personal data.
3. Please be advised that based on the executory decision of the European Commission dated 12 July 2016 (more information available on [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_pl](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_pl)) we provide personal data only to the entities from the USA that have entered Privacy Shield programme while using services and technologies. Entities that have entered Privacy Shield programme guarantee that they will apply high standards in the scope of personal data protection that are applicable in the European Union, therefore, the use of their services and technologies in the process of personal data processing is in accordance with the law.
4. If you need further explanations as regards provision of personal data do not hesitate to contact us.

#### **10. Period of personal data processing**

1. According to applicable laws we do not process your personal data „forever”, but for the time needed to reach the set goal. Then your data will be irretrievably deleted or destroyed.
2. If we do not need to perform any other operations in relation to your personal data, except for their storage (e.g. when we keep the content of the order in case of possible claims), we additionally protect them by way of pseudonymisation until they are completely deleted or destroyed. Pseudonymisation consists in encryption of personal data or a set of data and the lack of additional key they cannot be read, so, such information are useless for unauthorized persons.
3. As regards individual periods of personal data processing, please be informed that personal data are processed for a period of:
  - The term of the contract — as regards personal data processed for the purpose of conclusion and execution of the contract;
  - 3 years or 10 years + 1 year — as regards personal data processed for the purpose of establishing, pursuing or protecting against claims (the length of period depends on whether both parties are entrepreneurs or not);
  - 6 months — as regards personal data that have been collected at the quotation of the offer and the contract was not concluded forthwith;
  - 5 years — as regards personal data involving the fulfilment of obligations under the tax law;
  - Until consent has been withdrawn or the purpose of processing has been reached, however, no longer than for a period of 5 years — as regards personal data processed on the basis of your consent;
  - Until effective objection or reaching the purpose of processing, however, no longer than for a period of 5 years — as regards personal data processed on the basis of legally justified interest of Personal Data Controller or for marketing purpose;
  - Until the data become outdated or they are no longer needed, however, no longer than for a period of 3 years — as regards personal data processed mainly for analytical purposes, the use of cookies and administration of the website.
4. Periods in years are calculated since the end of the year during which we started processing of personal data in order to facilitate the process of deleting or destroying personal data. Separate calculation of the period for each concluded contract would involve material organizational and technical obstacles and a significant financial outlays, therefore, determination of one date for the data to be deleted or destroyed enables us to manage this process more smoothly. Certainly, if you exercise your right to be forgotten, such situations are analysed individually.
5. Additional year connected with the processing of personal data collected for the purpose of the execution of the contract is

dictated by the fact that hypothetically you may submit your claim just before the expiry of the limitation period, demand can be delivered with a significant delay or you can wrongly define the limitation date of your claim.

#### **11. Rights of authorised entities**

1. Please be informed that you have the right to:
  - Access your personal data;
  - Rectify your personal data;
  - Delete your personal data;
  - Limit the processing of your personal data;
  - Object to the processing of your personal data;
  - Be forgotten if it is permitted by the law;
  - Receive a copy of data
  - Data portability.
2. We respect your right resulting from personal data protection regulations and we exercise the utmost care to enable their execution.
3. Please be advised that your rights are not absolute, so, in some situations we may legally refuse to exercise them. However, if we refuse to take your demand into account, it is only after an extensive analysis and only in a situation when such refusal is indispensable.
4. Please be advised that as regards your right to object you have the right to object to the processing of your personal data at any time on the basis of legally justified interest of Personal Data Controller (they are listed in clause III) on account of your special situation. However, please bear in mind that according to the law we may refuse to take your objection into account if we prove that:
  - There are legally justified grounds for the processing that are superior to your interests, rights and freedom, or
  - There are reasons for establishing, pursuing or protecting against claims.
5. Moreover, you can object to the processing of your personal data for marketing purposes at any time. In such event after receiving your objection we will stop processing your data for this purpose.
6. You can exercise your rights in the following manner:
  - Send an e-mail to Personal Data Officer to the following address: [iod@golebiewski.pl](mailto:iod@golebiewski.pl)
  - Or send such request to the address of Personal Data Officer – Wołomińska Street 125, Ciemne, 05-250 Radzymin;

#### **12. Right to lodge a complaint**

If you think that your personal data are not processed in conformity with the applicable laws, you have the right to lodge a complaint to the President of Personal Data Protection Office.

#### **13. Final provisions**

1. The provisions of personal data protection regulation are applied in issues not governed by this Privacy Policy.
2. TAGO reserves its right to change this Privacy Policy with the reservation that services rendered before such change are subject to the version of the policy as of the date of the conclusion of the contract.
3. Changes in the Privacy Policy shall not infringe acquired rights.
4. Information about the change in the Privacy policy shall be published on the website: [www.tago.com.pl](http://www.tago.com.pl) 14 calendar days before such changes become effective.
5. This Privacy Policy is effective as of 25 May 2018.