
WEBSITE PRIVACY POLICY WITH GENERAL RULES FOR PROCESSING PERSONAL DATA

1 The administrator of your personal data collected through the website is Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska - Huk „InfoCredit”, NIP: 5210281798, referred to herein as “Administrator”.

2. The Administrator shall process your personal data in accordance with the provisions of this Policy and the applicable data protection regulations, including Regulation (EU) 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, hereinafter referred to as “GDPR”;

3. Any questions regarding the processing of your personal data, please contact the Administrator.

Administrator's contact information:

Iwona Surdykowska-Huk doing business under the name Iwona Surdykowska - Huk „InfoCredit”

Address: 10 Foksal St., 00 - 366 Warsaw

NIP: 5210281798

Contact: odo@infocredit.pl

The Administrator has appointed a Data Protection Inspector, whom you can contact at e-mail address:

iod@infocredit.pl

4a. Conducting correspondence via e-mail

The Administrator processes your personal data in accordance with applicable regulations for the purpose of conducting correspondence via e-mail.

The Administrator conducts correspondence via e-mail with the following individuals who have sent a message to Iwona Surdykowska-Huk conducting business under the name Iwona Surdykowska - Huk „InfoCredit” via e-mail.

Personal data of individuals who correspond via e-mail box are processed for the purpose of establishing contact, responding to the sent inquiry, further correspondence and possible presentation of an offer in the area covered by the subject of the conducted talks (only and only after your prior request to present such an offer!).

Personal data in the field of e-mail are processed on the basis of Article 6(1)(f) of the RODO - in order to realize the legitimate interest in the form of sending a response to your inquiry and conducting direct marketing activities.

The scope of personal data processed by the Administrator may include the following personal data of the person who provided it directly to the ADMINISTRATOR, primarily:

- Name,
- E-mail address,
- other voluntarily provided personal data found in an e-mail addressed to the Administrator.

Your personal data may be entrusted by me to entities cooperating with me in order to maintain the highest quality of service in handling your request.

Provision of such personal data is not a statutory requirement. Their provision to the Administrator is voluntary, however, failure to provide them may make it impossible to service your inquiry.

Please be informed that the Administrator does not process your personal data for the purpose of automated decision-making.

4b. Processing of personal data in connection with account registration and login to the site

On my website, you can register your account and then, after logging in, use your account as a registered user. Maintaining the highest standards of security in the processing of your personal data, I point out that in the processes of registration and logging into our store, as well as to use the functionality provided by the status of a registered user of the site, we process the personal data you provide for the following purposes and on the basis of the following legal provisions:

- to conclude and perform a contract for the provision of services consisting in enabling the establishment and maintenance of an account or to take action at the customer's request prior to its conclusion - the legal basis for the processing of this data is Article 6(1)(b) of the GDPR, i.e. the processing is necessary for the conclusion and performance of the contract;
- in order to implement the access service and to use reports and databases and to make payments for these services - the legal basis for processing this data is Article 6(1)(f), i.e. the legitimate interest of the Administrator, which is to provide the service of access to the website;
- accepting and processing complaints regarding the account held - the legal basis for the processing of this data is Article 6(1)(b), (c) of the GDPR, i.e. the processing is necessary for the performance of a legal obligation incumbent on the Administrator and the fulfillment of obligations arising from the concluded contract for the provision of services,
- undertaking direct marketing activities by me - the legal basis for the processing of this data is Article 6(1)(f), i.e. the legitimate interest of the Administrator, which is to adjust the advertising content displayed;
- possible assertion of claims against a registered account user - the legal basis for processing this data is Article 6.1.f, i.e. the processing is necessary for the purposes of the Administrator's legitimate interest;
- fulfilling legal obligations arising from regulations, e.g. tax and accounting - the legal basis for the processing of this data is Article 6(1)(c), i.e. the processing is necessary for the fulfillment of the Administrator's legal obligations;

- to conduct correspondence with Customers, including responding to Customers' messages - the legal basis for processing this data is Article 6(1)(f), i.e. the processing is necessary for purposes arising from the legitimate interest of the Administrator,
- for analytical and statistical purposes - the legal basis for processing this data is Article 6(1)(b), i.e. the legitimate interest of the Administrator, which consists in conducting analyses of the behavior and activity of registered users, as well as their preferences, in order to improve the quality and adequacy of the functionalities used and services provided by us.

All personal data are provided by you voluntarily, however, refusal to provide them will result in the inability to create an account and use its functionality.

Your personal data may be processed on the basis of your consent granted pursuant to Article 398 of the Act of 12 July 2024. Electronic Communication Law (Journal of Laws 2024 item 1221) allowing the Administrator to send commercial information, including direct marketing.

The consent is given voluntarily, and its lack does not affect the possible cooperation with the Administrator (if it has been given earlier), however, it may result in the lack of possibility to take certain actions (e.g. the possibility to send an offer electronically). Consent may be withdrawn at any time by sending a statement of withdrawal of consent. The withdrawal of consent will not affect the lawfulness of data processing carried out on the basis of the above consent before its withdrawal.

The scope of personal data processed by the Administrator may include the following personal data of the person who provided it directly to the ADMINISTRATOR, primarily:

- name,
- surname,
- email address,
- address,
- company name,
- TAX ID,
- phone number.

Providing these personal data is not a statutory requirement. Their provision to the Administrator is voluntary, however, failure to provide them will prevent you from creating an account on the website.

Please also be informed that your personal data may be entrusted by me to entities cooperating with me in order to maintain the highest quality of my service.

5. Your personal data may be transferred to third countries, i.e. outside the European Union and the European Economic Area, only in situations of e-mail correspondence with you via e-mail box (this happens in connection with our use of Microsoft tools). We would like to inform you that in this situation, appropriate mechanisms for the transfer of personal data based on the decision of the European Commission guaranteeing the security of personal data processing in a specific country or with the observance of the so-called standard contractual clauses, binding corporate rules or other legal instruments aimed at maintaining the RODO standards applied by us are always applied.

6. Persons whose personal data are processed by the Administrator shall have the following rights:

- The right to request access to their data;
- The right to request rectification of previously provided data;
- The right to request deletion of previously provided data;
- The right to restrict the processing of previously provided data;

- The right to request the transfer of previously provided data;
- The right to object to the processing of data.

WHAT ARE THE RIGHTS?

The right to access your data and to receive a copy of your data (you will be provided with a copy of your personal data if you have previously requested it),

The right to rectification of the processed data (you have the right to request immediate rectification of personal data that is incorrect, and in addition, taking into account the purposes of processing, you have the right to request completion of incomplete personal data, including by providing an additional statement),

The right to request erasure of processed data (you have the right to request immediate erasure of data when:

- Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- you withdraw the consent that is the basis for the processing,
- when you raise an objection to processing and there are no overriding legitimate grounds for processing,
- the data are processed unlawfully,
- the data should be deleted in order to comply with a legal obligation under Polish or European law).

However, the above will not apply if the processing of your data is necessary for:

- exercise your right to freedom of expression and information,
- to comply with a legal obligation requiring processing under European or Polish law,
- to establish, assert or defend claims.

Right to restrict processing

You are entitled to request the restriction of processing in the following situations:

- when you question the accuracy of the data (for a period of time that allows you to check the accuracy of the data),
- when the processing is unlawful,
- when the Administrator no longer needs the personal data for the purposes of the processing, but they are needed by the data subject to establish, assert or defend claims,
- when you object to the processing (until it is determined whether the legitimate grounds on our side override the grounds for the objection).

The right to data portability (to another data controller or directly to you within the scope of Article 20 of the GDPR - in a structured, commonly used machine-readable format,

The right to object (you have the right to object at any time to the processing of your data for the purposes of direct marketing, including possible profiling; in this situation, the Controller will not be entitled to process your data unless the Controller demonstrates the existence:

- valid legitimate grounds for processing that override your interests, rights and freedoms, or
- grounds for establishing, asserting or defending the Administrator's claims.

7. The data subject has the right to lodge a complaint with the supervisory authority if he/she feels that his/her rights are not being duly respected and implemented. Before that, however, I recommend that you take up correspondence at the Administrator's e-mail address that I have indicated to you above.

8 The Administrator shall retain individual personal data for the period necessary to fulfill the purpose for which they are collected, i.e. for the following periods:

- for the time necessary for correspondence with the Administrator in the framework of a submitted inquiry via the e-mail box,
- for the duration of ongoing marketing activities, or until you object to further data processing for marketing purposes,
- for the time you have an active account on the website,
- other time limits under the law (applies to data necessary for the performance of legal obligations incumbent on us).

We would like to inform you that the Administrator processes data to the extent necessary to fulfill the purposes of processing indicated above. If there is more than one purpose, the relevant retention period is the longer period.

The Administrator in the future may be entitled to process personal data for the period necessary for the realization of another legitimate interest (e.g. possible recovery of claims).

The Administrator shall also not be entitled to further processing of personal data in the event that the data subject withdraws the consent given pursuant to Article 398 of the Act of 12 July 2024. *Electronic Communications Law* (Journal of Laws 2024, item 1221).

However, the above will not affect the legality of the previous processing of personal data.

9. The Administrator shall process personal data in a manner that ensures its integrity and confidentiality.

10. Information on cookies:

1) I inform you that the Administrator stores cookies.

2) Using my website means that they will be placed on the device you use. You can change your browser settings at any time.

3) By "cookies" we mean computer data, in particular text files, stored on the users' terminal devices (such as computer, phone or tablet), transmitted by websites. These files allow to recognize the user's device and appropriately display the website tailored to the user's individual preferences, allow to display the website in the user's language "remembered" by these files, as well as use other website settings selected by the user. "Cookies" usually contain the name of the website from which they come, the time they are stored on the end device and a unique number. They are also used to create anonymous, aggregate statistics, which help to understand how the user uses the websites which allows to improve their structure and content, excluding personal identification of the user. Cookies also help to ensure the refinement and smooth operation of websites, including website performance testing.

4) The administrator may use "cookies" to customize the site to the user's preferences and to create statistics.

5) We divide the cookies we use into:

Session cookies - files of this type identify the user of the site during the ongoing visit. Session cookies are handled in ephemeral memory and are not stored in permanent memory (e.g. hard drive). When you close the application or web browser, session cookies are automatically deleted.

Permanent cookies - files that have a specified expiration time. They make the use of frequently visited sites more user-friendly (e.g. remembering the selected location and language).

Third-party cookies - files can be read by third-party ICT systems. This is information posted by scripts of other websites.

6) How to remove / block “cookies”?

The cookies used are primarily intended to make it easier for the visitor to use our site, for example, by “remembering” the information provided once, so that the visitor does not have to provide it each time, as well as serve to adapt the content, including the advertisements presented, to the visitor's preferences. Cookies are also used to enhance the usability and personalization of the website's content, including the presentation, creation, allocation and fulfillment of advertisements or offers dedicated to a given visitor according to his or her interests (applicable only if he or she is of age and has consented to such action).

A visitor can change the use of cookies by managing the consents given as part of the privacy settings on our site or through a browser or site, including blocking or deleting those from the site and other websites. To do this, you will need to change your browser or application settings. The method of deletion varies depending on the browser you use. Information on how to delete cookies should be located in the “Help” tab of the selected web browser. Deletion of cookies is not the same as deletion of personal data by the Administrator obtained through cookies. For this process, we refer to the relevant content within this Privacy Policy.

7) What will be the consequences of deleting or blocking cookies?

Restricting the use of cookies on a particular device prevents or significantly impedes the proper use of the site.

8) We point out that, as a rule, cookies do not store personal data that would allow the identification of the customer. We point out, however, that in a situation where such a possibility arises, the information contained in this Privacy Policy relating to the principles of processing personal data applies accordingly to cookies.

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The user, by changing the settings of his/her web browser, may not agree to the collection of his/her data by means of “cookies”. If no changes are made, it shall be presumed that the user has consented to the use of “cookies” by the website.

11. The Administrator reserves the right to amend this document.