

## **Privacy and cookie policy**

### **Rules for processing Users' personal data**

From May 25, 2018 in Poland there applies EU Regulation 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 (referred to as "GDPR", "ORODO", "GDPR" or "General Data Protection Regulation").

Therefore, we would like to inform you about the processing of your data and the rules on which it takes place from May 25, 2018. Below you will find basic information on this topic.

Ostoja Zaskalskie pays great attention to respecting the rights of Internet users, with particular emphasis on the right to protection of privacy. The Privacy Policy presented below explains the principles we collect and process personal data.

#### **1) Rules for the processing of personal data:**

- a) "legal compliance, reliability and transparency",
- b) "purpose limitation",
- c) "data minimization",
- d) "regularity",
- e) "storage restriction",
- f) "integrity and confidentiality"

#### **2) Conditions for the lawful processing of personal data:**

- a) the data subject has consented to the processing of their personal data for one or more specified purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or to take action at the request of the data subject before the conclusion of the contract;
- c) processing is necessary to fulfill the legal obligation incumbent on the administrator;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, except for situations where the interests or fundamental rights and freedoms of the data subject, requiring personal data protection, prevail over these interests, especially if the data subject is a child.

## **For what purpose and on what basis the data will be processed**

Your personal data obtained in connection with the use of the website will be processed for the following purposes, based on the following legal grounds:

1. handling the created account - based on the premise of the necessity of processing to perform the contract or to take action at your request before concluding the contract, pursuant to art. 6 clause 1 let. b) GDPR,
2. presenting a commercial offer (electronically via email) - based on the consent granted, pursuant to art. 6 clause 1 let. a) GDPR,
3. the implementation of the entrusted order (if applicable) or (if consent) for marketing contact by phone or via email - based on the premise of processing necessary to perform the contract or taking action at your request before the conclusion of the contract, based on the premise of necessity processing to fulfill the legal obligation incumbent on the administrator or based on the consent granted, pursuant to art. 6 clause 1 let. b), let. c) or let. a) GDPR;
4. conducting marketing activities, including customer acquisition and retention - based on consent granted or based on the premise of the necessity of processing to achieve the objectives arising from legally justified interests pursued by the administrator, pursuant to art. 6 clause 1 let. a) or let. f) GDPR;
5. sale of products and services - based on the premise of the necessity of processing to perform the contract or taking action at your request before the conclusion of the contract, based on the premise of the necessity of processing to fulfill the legal obligation incumbent on the administrator or based on the premise of the necessity of processing to achieve the resulting objectives of legitimate interests pursued by the administrator, pursuant to art. 6 clause 1 let. b), let. c) or let. f) GDPR;
6. related to the conducted business activity, including for the purposes of conducting analyzes and statistics - based on the consent granted or based on the premise of the necessity of processing to achieve the objectives arising from legitimate interests pursued by the administrator, pursuant to art. 6 clause 1 let. a) or let. f) GDPR;
7. answering letters and applications, answering and considering possible complaints, and possibly in order to determine, investigate or defend claims - based on the premise of the necessity of processing to achieve the objectives arising from legitimate interests pursued by the administrator, pursuant to art. 6 clause 1 let. f) GDPR.

Providing personal data that will be processed in the above-mentioned purposes is voluntary, however, failure to provide personal data may result in the inability to achieve these purposes.

## **Who is the data administrator and how to contact him**

The administrator of your personal data is Paweł Toborowicz Kościuszki 54, 42-436 Pilica.  
The administrator has appointed the Personal Data Protection Inspector - contact to the DPO: rezerwacje@apartamentjaworki.pl

## **For how long will the data be stored**

The period of storage of your personal data depends on the purpose for which the data is processed. The period for which your personal data will be stored is calculated based on the following criteria:

1. legal provisions that may oblige Ostoja Jaworki to process data for a specified period;
2. the period necessary to maintain and service the account created on the websites;
3. the period necessary to provide services and provide the necessary customer service;
4. the period necessary to implement the administrator's legitimate interests, including for the duration of consideration of possible complaints, for the duration of determination, investigation or defense of claims;
5. the period for which consent was given, not longer than until the consent is withdrawn;
6. until the objection to further processing of personal data, if the processing of data takes place on the basis indicated in art. 6 clause 1 let. f) GDPR.

## **Your rights**

You have the right to:

1. request access to personal data regarding your person;
2. rectification of data;
3. request to supplement incomplete personal data, including by presenting an additional statement;
4. deletion of data or processing restrictions;
5. transfer your personal data.

You have the right to object at any time - for reasons related to your particular situation - to the processing of your personal data based on the basis indicated in art. 6 clause 1 let. f) GDPR, including profiling based on this provision (if applicable). In this situation, we will not process your personal data for these purposes, unless there are valid legitimate grounds for such processing, superior to your interests, rights and freedoms, or there are grounds for establishing, pursuing or defending claims. You also have the right to object to the processing of your personal data at any time, in a situation where your personal data is processed for the purposes of direct marketing - in which case we will not process your personal data for such purposes.

You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing of your data, which was made on the basis of consent given before its withdrawal.

In addition, you have the right to lodge a complaint with the supervisory body if you find that the processing of your personal data violates the provisions of the GDPR. The supervisory body in Poland is the President of the Office for Personal Data Protection (PUODO) with headquarters in Warsaw, ul. Stawki 2, which you can contact:

- by letter: ul. Stawki 2, 00-193 Warsaw;
- using the electronic inbox, which is available at <https://uodo.gov.pl/pl/p/kontakt>;
- by phone: 22 531 03 00, Helpline: 606-950-000.

### **Other information regarding data processing**

Personal data may be disclosed to employees or associates of Ostoja Zaskalskie, contractors and clients of the administrator, as well as entities providing support to the administrator on the basis of commissioned services and in accordance with entrustment agreements concluded.

Personal data will not be processed in an automated manner, including profiling.

Personal data will not be transferred to third countries within the meaning of the GDPR or to international organizations.

### **How to obtain information about data processing**

All correspondence regarding matters related to the processing of your personal data should be sent to the administrator's address with the note "Personal Data" or by e-mail to the address: [rezerwacje@apartamentjaworki.pl](mailto:rezerwacje@apartamentjaworki.pl)

### **Use of cookies**

Our website uses statistical tools, which is why harmless cookies are saved on your device. We use them to better adapt the system to your requirements. We can also run a number of marketing campaigns using Google AdWords and Facebook Ads, which require saving cookies on the device you use. Your easily identifiable personal data is not transferred to third parties in any way. The identification is based on general data stored in cookies. Statistical data is not transferred, analyzed by entities other than the owner / administrator of the data.

Users of our website may at any time stop providing this information to our website by deleting cookies stored on their end devices 4 by our website. To do this, change the settings of the currently used web browser

You have the right to refuse saving and reading cookies on your device (computer, telephone). To do this, you must mark the appropriate settings in your web browser options or disagree if the application contained on the website asks you to do so.

Configuring the browser in a way that blocks the installation of cookies for specific websites selected by the user or for all pages may result in the loss of some functionality and make it difficult or impossible to fully use its possibilities. In accordance with the requirements of the Telecommunications Law and the GDPR, confirmation of consent to the use of cookies is considered to be the configuration of the browser allowing the installation of cookies on the computer.

### **How we secure your personal data**

Communication between your computer and our server when we collect your personal data is encrypted using the SSL (Secure Socket Layer) protocol. In addition, our databases are protected from being viewed by third parties.

### **Changes to our privacy policy**

We reserve the right to change the presented Privacy Policy by publishing new content on our website. After making the change, the Privacy Policy will appear on the page with a new date.

Pilica, 28.11.2018