

PRIVACY POLICY OF AGAP Sp. z o.o.

INTRODUCTION

This Privacy Policy contains information on the processing by AGAP Sp. z o.o. z/s in Warsaw of personal data of current and potential customers of the company, including persons using the company's websites, hereinafter referred to as "Users".

The purpose of this document is to provide the Users with brief and concise information about when and to what extent the personal data of users are processed by AGAP Sp. z o.o.

This policy is general in nature and discusses selected issues only. The legal basis for all rights of data subjects and the processing rules is the GDPR indicated below.

CONTACT INFORMATION

AGAP sp. z o.o. with its seat in Warsaw, ul. Jagiellońska 78, (03-301 Warsaw) registered in the Register of Businesses kept by the District Court for the capital city of Warsaw in Warsaw, XII (12th) Commercial Division under KRS number 0000025138, NIP (Tax ID) 527-232-97-16, REGON (Statistical Number) 017207713 (AGAP)

In all matters related to personal data protection you may contact us directly by e-mail at: iod@agap.pl or by post at the address indicated above.

PROVISIONS OF LAW

This Privacy Policy is based on the provisions of the GDPR, i.e. the 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 (General Data Protection Regulation) ((OJ EU L No. 119, p. 1).

RULES OF PROCESSING OF YOUR PERSONAL DATA

We follow the following rules:

- We collect personal data only in the minimum extent that is necessary to pursue the purposes for which the data are collected;
- the purposes of collecting personal data are clearly defined and based in the provisions of law – we do not process personal data contrary to those purposes;
- we make sure that the personal data are up-to-date and correct, which is why we immediately respond to all requests to rectify or update data;
- we comply with your right to have access to your personal data and to have them rectified;
- we comply with your right to have your personal data erased, to withdraw your consent, to data portability, to object to personal data processing, to not be subject to a decision that is based exclusively on automated data processing, including profiling;
- we restrict retention of personal data in line with the provisions of law to the period that is necessary to pursue the purposes for which the data are collected, subject to events that may extend the retention period;
- we protect personal data against being lost, accessed by unauthorised persons, accidental loss or modification, and other unlawful forms of processing;
- if personal data are made available to other entities, it is effected in a safe way and under safeguards offered in a contract, and in line with the binding provisions of law.

RULES OF USERS

IN CONNECTION WITH PERSONAL DATA PROCESSING

You have the following rights:

- to **withdraw consent** for personal data processing at any time;
- to **have access to your data**;
- to **have your data rectified**, e.g. data that are out-of-date or imprecise, as well as to supplement your data if the data are incomplete;
- to **make an objection to processing of your personal data**; however, if we process personal data based on our legitimate interest, and should you object, we would have to stop processing your personal data, unless we prove the existence of important, legitimate grounds for processing which should, objectively, take precedence before your discomfort, or if they are grounded in the necessity to defend our claims (e.g. in litigation)
- to **have your data erased** ("the right to be forgotten")
- to **have the processing of your personal data restricted**;
- to **data portability**;
- to **lodge a complaint to a supervisory authority** – President of the Personal Data Protection Office.

Your requests submitted to AGAP will be granted without undue delay, no later than within 30 days after receiving them. The said time limit may be extended due to the complex nature of the request or the number of request, by another month (months), and we will inform you about this fact. Until such a time that the request is granted, it may happen that you will receive information from us that you opted out of by withdrawing the consent.

PERSONAL DATA SAFETY

AGAP will undertake legitimate technical and organisational measures used to protect personal data against unlawful or unauthorised access or use, as well as against accidental loss, damage, or disruption of integrity.

Your personal data may be processed by third parties only if such an entity undertakes to ensure the relevant technical and organisational measures to guarantee the safety of processing of personal data and the confidentiality of such data. Each AGAP employee with access to personal data holds a relevant authorisation and is obligated to comply with the confidentiality obligation.

HOW DO WE PROCESS YOUR DATA?

AGAP processes personal data exclusively for specified and lawful purposes. We will not process data contrary to such purposes.

WAYS OF COLLECTING DATA

Your personal data may come from multiple sources; they may also have been collected on the basis of your consent.

WHAT KIND OF DATA WE MAY PROCESS?

Personal data may include your identification information, e.g. given name, last name, contact information: e.g. phone number, e-mail address, data on your orders, commissions, complaints. Each time we will determine and process only the necessary scope of data.

DATA RETENTION

AGAP retains personal data only for the period that is required to pursue the purposes that the User had been informed about. The data retention storage is set forth strictly in line with the binding provisions of law. You have the right to obtain information from us as to the probable retention period of your personal data.

MAKING DATA AVAILABLE TO OTHER ENTITIES

With the consent of the User, depending on the purpose of data processing, the wording of the consent to processing and making available, and also depending on the type of the service rendered to you by AGAP, your personal data may be made available to other entities.

Your personal data may be but might not be transferred to the following categories of data recipients who process data on behalf of AGAP: commercial partners, debt collection agencies, banks, companies printing correspondence, subcontractors of AGAP, commercial information bureaus, archiving companies, companies dealing with public opinion polling, partners rendering technical services.

COOKIES

In connection with your use of the AGAP's websites, AGAP collects data contained in system logs. AGAP uses them mainly for technical purposes related to server administration. System logs record information about IP addresses (network interface numbers); however, such data do not allow us to explicitly identify a user (identification of a specific natural person using a computer or another device connected to the Internet).

Cookies are small text files sent by the website and saved on the User's computer (or on another device that the User uses). We do not use cookies to collect personal data such as: given name, last name, or e-mail address.

CHANGES TO THIS POLICY

AGAP reserves the right to introduce changes in this Policy, which might be due to the need to adjust it to amendments of the provisions of law or the applicable privacy standards, or extension of our offer. Therefore, AGAP will inform about all and any changes in this Policy at AGAP's websites.