PRIVACY POLICY

www.szkoleniadialuxevo.pl

In this document you will find the rules for the processing of personal data in connection with the use of the website www.szkoleniadialuxevo.pl (hereinafter: "**Service**").

The owner of the website and the administrator of your personal data is Emil Piotrowski conducting business activity under the name EM-LIGHT EMIL PIOTROWSKI in Tarnów (33-100) at Szpitalna 39A lok. 46, NIP 7282672871, REGON 385877785 (hereinafter referred to as the "Service Owner" or "Personal Data Administrator").

If you have any doubts related to the processing of your personal data or the content of the Privacy Policy, you can contact me at any time at the following e-mail address: <u>biuro@szkoleniadialuxevo.pl</u>

Short version - the most important information for You:

- 1. When you use the Service, among others: filling out a Contact form, you provide the Service Owner with your personal data. The Data Administrator guarantees you that your data will remain confidential, secure and will not be made available to any third party without your consent.
- 2. The Personal Data Administrator shall apply technical and organizational measures to ensure the protection of the processed data in accordance with the requirements set forth in applicable laws related to the protection of personal data.
- 3. The Personal Data Administrator collects and processes only the necessary personal data and through the shortest possible time, and for any activities not related to the implementation of the sales contract or you must give separate consent to provide services.
- 4. Only authorized and trained persons have access to your personal data scope of personal data protection, guaranteeing their security.
- 5. Your personal data is processed only by verified and trusted entities providing services to the Data Administrator in order to implement the contract concluded with you or providing services through the Service. These entities use appropriate and legally required security measures for the processed personal data.
- 6. The Service uses analytical tools using them the Data Administrator collects files cookies. You can read the Cookies Policy available under this Privacy Policy.

Below you will find detailed information regarding the processing of your personal data by the Data Administrator in connection with the operation of the Website.

1. Legal Basis:

The information is provided on the basis of Article 13 of the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 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 (Data Protection Directive) (General Data Protection Regulation), (hereinafter: "**GDPR**").

2. Information about the Data Administrator:

The administrator of your personal data is Emil Piotrowski conducting business activity under the name EM-LIGHT EMIL PIOTROWSKI in Tarnów (33-100) at Szpitalna 39A lok. 46, NIP 7282672871, REGON 385877785. (hereinafter referred to as "**Data Administrator**").

3. Contact details:

Contact with the Data Administrator is possible via e-mail address: <u>biuro@szkoleniadialuxevo.pl</u> or by correspondence to the Administrator's registered address.

4. Purposes and legal basis for the processing of personal data

The purpose of processing the personal data provided in the Contact Form is to establish contact with the person completing the Form and to respond in accordance with the information provided in the Form - based on Art. 6 section 1 letter f of the GDPR, i.e. legally legitimate interest pursued by the Administrator. The legitimate interest is contact with the person filling out the form and fulfilling the request.

Personal data will also be processed by the Administrator for the purposes of:

- a. provision of services offered on the Website legal basis of Article 6(1)(b) of the GDPR,
- b. proper performance by the Administrator of the agreement for the provision of services by electronic means legal basis Article 6(1)(b) GDPR,
- c. to respond to a message received by email or correspondence or to establish further cooperation based on the message legal basis of Article 6(1)(f) GDPR. The legitimate interest is to contact the person sending the message in order to respond or establish cooperation,
- d. to provide answers to questions and issues presented during a telephone contact with the Administrator or to establish further cooperation on the basis of a conversation legal basis Article 6(1)(f) GDPR. The legitimate interest is to answer issues and questions presented during the conversation or to establish cooperation,
- e. Consideration of possible complaints, defense against reported claims that may arise in connection with the Administrator's provision of services, including electronic services, or with regard to the processing of personal data - legal basis Article 6(1)(f) GDPR. The legitimate interest is the defense of the Administrator against claims and the processing of complaints,
- f. to pursue claims and take collection actions if the Administrator has the right to do so
 legal basis of Article 6(1)(f) of the GDPR. The Administrator's legitimate interest is to pursue claims,
- g. to perform ongoing analysis of the Service and to ensure its proper operation and improve its security legal basis Article 6 (1) (f) GDPR,
- h. publishing on the Website the opinion of a person or company who has used the services of the Data Administrator legal basis Article 6(1)(a) GDPR consent of the person issuing the opinion.

Your data may also be processed for the following collateral purposes: archiving of data and maintenance of compilations, analysis and statistics - legal basis Article 6(1)(f) GDPR, consisting

of maintenance of internal compilations and statistics of its customers and completed orders by the Data Administrator.

5. Categories of processed data:

The Data Administrator processes your personal data, i.e.:

- a. identification data: first name, last name, nickname or social media nickname,
- b. address and contact data: phone number and email address,

If you are making contact or establishing cooperation and entering into a contract in the framework of your business activity, the Administrator will also process the name of your company or the company you represent, the address of your registered office and your VAT, NIP, REGON or KRS number, which will be processed for the purpose of executing the contract or for billing purposes (e.g. issuing an invoice).

In the case of processing the data indicated in the contact form, the Administrator will also process the data provided to him in the content of the form.

6. Source of data:

I collect personal data only from data subjects.

7. Voluntary provision of data

Provision of personal data is voluntary, but necessary for the Administrator to provide services to you and necessary for the execution of the concluded contract or to undertake contact.

8. Period of data storage:

Your personal data will be processed by the Data Administrator:

- a. to perform the contract and provide services for the duration of the contract,
- b. to respond to the message received by email or correspondence until the end of the correspondence between the parties or the end of the cooperation undertaken based on the message,
- c. to respond to questions and issues presented during telephone contact with the Administrator until the end of the telephone conversation or termination of cooperation undertaken based on the conversation,
- d. for the purpose of considering possible complaints, defense against claims raised until the statute of limitations for potential claims against the Administrator,
- e. to pursue claims and take collection actions if the Administrator is entitled to do so until the statute of limitations for potential claims,
- f. for the purposes of litigation according to Polish law (Civil Code), data may be processed up to 6 years from the date of issuance of a final judgment ending the proceedings,
- g. for the purposes of compiling statements, analyses and statistics- for the duration of the contract, and then no longer than the period after which the statute of limitations for claims arising from the contract expires,

h. for archival and accounting purposes - after the expiration of the contract, personal data shall be processed for a maximum period of 5 years, unless a shorter period is provided for by law.

Data whose processing is based on consent will be processed until it is withdrawn. The withdrawal of consent does not affect the legality of processing that was carried out on the basis of consent before its withdrawal.

9. Recipients of data:

Your personal data may be shared with entities cooperating with the Data Administrator for the purpose of performing the contract concluded with you. In particular, the data processed by the Data Administrator may be accessed by its employees and associates. Your personal data may also be accessed by other entities performing tasks commissioned by the Administrator, which are related to the Administrator's business activities, such as:

- a. Website hosting,
- b. maintenance of the website and maintenance of the IT systems in which the data is processed,
- c. providing analytical, IT, legal services, etc.

Personal data in the form of the name and surname of persons who have been trained in the DIALux evo program by the Administrator (as a certified trainer) may be transferred to the software provider, i.e.: DIAL GmbH | Bahnhofsallee 18 | D-58507 Lüdenscheid, upon completion of the training, for statistical purposes and to fulfill the contract with the software provider.

All entities to which the Administrator entrusts the processing of personal data shall guarantee the application of appropriate measures for the protection and security of personal data required by law.

10. Rights of data subject:

The data subject is entitled to:

- a. access to personal data,
- b. correction of data (The Administrator will comply with a data subject's request to edit and update incorrect personal information promptly and in most cases within 30 days from the receipt of the request for correction.),
- c. to delete or restrict processing (in cases provided by law),
- d. to data portability at a data subject's request (does not apply to data that constitute a business secret, shall not adversely affect the rights and freedoms of others, including trade secrets or intellectual property, and shall be exercised to the extent technically possible),
- e. object to their processing (Where the Administrator processes a data subject's personal information based upon the lawful basis of legitimate interest, then the individual has the right to object to this processing).
- f. lodge a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection (Prezes Urzędu Ochrony Danych Osobowych) with its seat in

Warsaw (00-923) at Stawki 2. If a data subject is not satisfied with the Administrator's response, they have the right to complain to or seek advice from a supervisory authority and/or bring a claim against the Administrator in any court of competent jurisdiction.

g. withdraw consent - a data subject who has provided the Administrator with consent to process their personal information has the right to withdraw any consent previously provided to the Administrator at any time. If a data subject withdraws their consent, this will not affect the lawfulness of the Administrator's collecting, using and sharing of their personal information up to the point in time that consent was withdrawn. Even if a data subject withdraws their consent, the Administrator may still use the information that has been anonymized and does not personally identify the data subject.

You can exercise your rights under GDPR (Articles 16 – 21) by contacting the Data Administrator by mail: <u>biuro@szkoleniadialuxevo.pl</u>

11. Automated decision-making, profiling

Data Subject will not be subject to decisions with a legal or similarly significant effect (including profiling) that are based solely on the automated processing of their personal data.

12. Transfer of data to a third country or international organization

The Administrator does not transfer personal data to a third country or international organization.

13. Security

The data controller guarantees the confidentiality of any personal data provided to it. Technical and organizational measures are used to ensure the protection of the processed data in accordance with the requirements set forth in applicable laws related to the protection of personal data. Personal data are collected with due diligence and properly protected against access by unauthorized persons.

The Administrator collects and processes only the necessary personal data and for the shortest possible time, and for any activity not related to the performance of the sales contract or the provision of services you must give separate consent.

Cookies policy

- 1. The Administrator informs that the Website uses "cookies" (cookies), installed on your terminal device. These are small text files that can be read by the Administrator's system, as well as by systems belonging to other entities whose services are used by the Administrator (e.g. Facebook, Google).
- 2. The Administrator uses cookies for the following purposes:
 - ensuring proper operation of the Website cookies enable efficient operation of the Website, use of its functionalities and for proper and smooth movement between individual subpages,

- b. ensuring security cookies are used to authenticate users. They are used to protect the user's personal data from unauthorized access (e.g. data provided in the contact form),
- c. increasing the comfort of browsing the Website with cookies it is possible to detect errors on some subpages and their constant improvement,
- d. creating statistics cookies are used to analyze how users use the Website (e.g. number of users visiting the Website, time of using the Website, interest and time of viewing content). This makes it possible to constantly improve the Website and adjust its operation to the preferences of users.
- e. conducting marketing activities with cookies, the Administrator can direct advertisements to users tailored to their preferences (as long as such activities are undertaken by the Administrator).
- 3. The Administrator may place both permanent and temporary files on your device. Temporary files are usually deleted when you close your browser, while closing your browser does not delete permanent files.
- 4. Information about the cookies used by the Administrator is displayed in the panel at the bottom of the Website. Depending on your decision, you can enable or disable cookies of each category (except for essential cookies) and change these settings at any time.
- 5. Data collected through cookies do not allow the Administrator to identify you.
- 6. the Administrator uses the following tools that use cookies:
 - a. necessary cookies of the Website these cookies enable the proper and safe functioning of the Website (they are used, among other things, to adjust the layout of the Website to the screen of your device), therefore it is not possible to disable them (the functioning of these cookies is a condition for using the Website). Necessary cookies remain on your terminal device for up to 1 year;
 - b. Google Analytics this tool (using cookies provided by Google LLC) enables the collection of statistical data about how users use the Website, including the number of visits, duration of visits, search engine used, location. The collected data helps improve the Website and make it more user-friendly. Cookies used by Google Analytics remain on your terminal device for up to 2 years;
- 7. Through most used browsers, you can check whether cookies have been installed on your device, as well as delete installed cookies and block future installation of cookies by the Service or other sites. However, disabling or restricting the use of cookies may cause quite difficulties in using the Service, such as the need to log on to each subpage, longer page loading times, limitations in the use of functionality.