

# PRIVACY POLICY

## Introduction - contact details

1. This Privacy Policy contains general information on the use (processing) by Marcin Fularczyk (ul. Kartuska 358, 80-125 Gdańsk) of personal data belonging to present and potential Customers.
2. Contact telephone number for the controller: 506-620-689, e-mail address: marcin.fularczyk@gmail.com.
3. We respect the privacy of our Customers, therefore we provide this Privacy Policy so that every Customer knows to what extent his / her personal data is processed, and thus could independently, consciously and freely decide whether he / she will use our services.
4. As part of this Privacy Policy, we have decided to describe in general how and to what extent we collect Customers' personal data, for what purposes we use this data, with whom we share it and how we protect it. The Privacy Policy also contains information about the rights of Customers as data subjects.
5. The policy is general and informative, presenting only some of the issues, which we consider to be the most important. The details of this policy are included in individual agreements, clauses and information that the Customer will receive when collecting personal data from him / her on the occasion of individual services, subscription (newsletter), contact forms, events, etc. The basis of all data subjects' rights and the rules of their processing is the general regulation of the GDPR and the act on personal data protection mentioned below.

## Principles of personal data processing.

1. We appreciate the trust our Customers have placed in us. As part of the processing of our Customers' personal data, we care for processing that data in a safe, reliable and legal manner transparent for the Customer.
2. Below are the most important principles we follow:
  - a) We collect personal data only to the minimum extent necessary to achieve the purposes for which they are collected.
  - b) The objectives of collecting Customers' personal data are clearly defined, they are based on the law – we do not process data in a manner inconsistent with these purposes. The data is processed in order to conclude or perform an agreement.
  - c) We care about the validity and correctness of Customers' personal data and we respond promptly to any requests for correcting or updating the data.
  - d) We obey the right of Customers to access their personal data and rectify them.
  - e) We also obey the rights of Customers to delete personal data, withdraw consent, limit processing, transfer data; the right to object to data processing, the right not to be subject to decisions based solely on automated data processing, including profiling.
  - f) We limit the storage of personal data in accordance with the law, only to the period necessary to achieve the purposes for which they are collected, unless there are events that may extend the period of data storage.
  - g) We protect Customers' personal data against loss, unauthorized access, accidental loss or change and other unlawful forms of processing.

- h) The provision of personal data to other entities may take place only in connection with the conclusion of an agreement for the provision of technical, IT or accounting services. The sharing of data takes place in a safe, contractually secured manner and in accordance with applicable law.
- i) Providing personal data is necessary for the proper performance of an agreement.

### **Rights of Customers in connection with the processing of personal data.**

1. We obey the rights of Customers related to the processing of their personal data. These rights result from the applicable legal provisions with regard to personal data, in particular the GDPR (art. 16-21).
2. The Customer has the right to:
  1. **Withdraw the consent** for the processing of personal data at any time (see point VII below).
  2. **Access the data:** The customer has the right to receive from us a confirmation that his / her personal data is processed by us and in what manner.
  3. **Rectify** outdated or inaccurate personal data, as well as the right to supplement them if incomplete.
  4. **Object to the processing of personal data** – if the basis for the processing of personal data is the interest of the Controller, the Customer has the right to demand the cessation of processing of his / her personal data. In this case, we will no longer have the right to process the data unless we demonstrate the existence of important legally valid grounds for processing that override the interests, rights and freedoms of the data subject or the grounds for establishing, investigating or defending claims. If the personal data are processed for the purposes of direct marketing, the Customer whose data is subject to such processing, has the right to object at any time to the processing of his / her personal data for the purpose of such marketing. If the Customer, whose data is subject to such processing, objects to the processing for the purposes of direct marketing, we shall no longer process his / her data for such purposes.
  5. **The right to delete personal data ("the right to be forgotten")** relies in principle on the Customer's request for immediate deletion of his / her personal data by the Controller.
  6. **The right to limit the processing of personal data** consists in submitting a request to reduce the scope, time or levels of processing the personal data and, as a consequence, to mark the data in order to limit their processing.
  7. **Transfer the data:** Customer has the right to receive a copy of the personal data that he / she provided to us if the processing is based on the consent of the Customer or on the basis of an agreement.
  8. **Lodge a complaint to the supervisory body** – Inspector General for the Protection of Personal Data.
3. All requests regarding the Customer's personal data processed may be sent by e-mail to the following address: marcin.fularczyk@gmail.com or in writing to the following address: ul. Kartuska 358, 80-125 Gdańsk.
4. The Customer's requests will be fulfilled without unnecessary delay, however not later than within one month after their receipt. This period may be extended due to the complex nature of the request or the number of requests, for further two months, about which the Customer will be informed. However, until the request is executed, it may happen that the Customer will receive from us information, which he / she resigned from by withdrawing his / her consent.

### **Security of personal data**

1. We take technical and organizational measures to protect personal data against illegal or unauthorized access or use, as well as against accidental destruction, loss or violation of integrity.

- Our security procedures include in particular: access security, backup system, monitoring, review and maintenance, management of security incidents.
2. As part of ensuring the security of the personal data being processed, we undertake to respect:
    - a) confidentiality – we will protect data against accidental disclosure to third parties,
    - b) integrity – we will protect data against unauthorized modification,
    - c) availability – we will provide authorised persons access to Customer's data only when the need arises.
  3. Customer's personal data may be processed by third parties only if such entity agrees to provide appropriate technical and organizational means to ensure the security of processing of personal data, as well as to preserve the confidentiality of such data. Every employee who has access to personal data has the appropriate authorization and is required to keep confidentiality.

### **Purpose and basis of Customer data processing**

1. We process personal data only for specific, explicit and legitimate purposes. We shall not process this data in a way that is incompatible with those purposes.
2. Within the framework of the information obligation, we inform the Customer about the purpose and legal basis of personal data processing in a separate message, for example on the website, in writing, etc.

### **Mode of data collection**

We collect and process personal data only on the basis of the consent granted or in connection with the performance of the agreement concluded with the Customer, when it is necessary to achieve its objectives.

### **Type of data processed**

Personal data in question may include your identification data, e.g. name, surname, contact details: e.g. phone number, email address, location data, agreement data. Each time we will define and process only the necessary data range.

### **Consent – withdrawal of consent**

1. We request permission to process personal data only when it is necessary and only to the extent that is necessary to achieve a specific objective. Undertaking marketing activities will always require explicit prior approval.
2. The user has the right to withdraw consent at any time by direct contact with us.
3. Withdrawal of consent does not entail any negative consequences or unpleasantness. The decision always belongs to the Customer.
4. Withdrawal of consent does not affect the lawfulness of the Customer's data processing, which was made on the basis of the consent before its withdrawal.
5. Customers' requests shall be processed immediately. After completing the request, we will cease processing Customer's data. However, until the request is executed, it may happen that the Customer will receive from us information, which he / she resigned from by withdrawing his / her consent.

### **Storage of data**

1. The main purpose of storing personal data is to implement an agreement. We store personal data for the period necessary to achieve the objectives about which the Customer has been informed.

2. The period of storage of personal data is determined in strict compliance with applicable law. The Customer has the right to obtain from us information on the probable duration of storage of his / her personal data.

### **Sharing data with other entities**

The transfer of personal data to entities other than entities performing accounting, IT or technical services may only take place on the basis of the Customer's express consent.

### **Changes in the Policy**

We reserve the right to make changes to this policy, which may result from the need to adapt to changes in law or applicable privacy standards, or to expand our offer. We will therefore inform Customers about any changes with an appropriate message.