

## PRIVACY POLICY

This Privacy Policy defines the principles of personal data processing by the Personal Data Controller - GRUPA MASPEX Sp. z o.o. Sp. k. z/s with registered office in Wadowice and it contains the Cookie Policy.

### I. Definitions

**Personal Data Controller** – GRUPA MASPEX Sp. z o.o. Sp. k. with registered office in Wadowice, address: 34-100 Wadowice, Legionów 37 Street, entered into the register of entrepreneurs of the National Court Register under number KRS 0000571274, whose registration files are kept by the District Court for Kraków - Śródmieście in Kraków, 12<sup>th</sup> Economic Department of the National Court Register, NIP (tax identification number): 5512617657, REGON (Polish business registry number): 122948517.

**Contact details of the Personal Data Controller:**

**Correspondence address:** GRUPA MASPEX Sp. z o.o. Sp. k., Legionów 37 Street, 34-100 Wadowice

**E-mail address:** [maspex@maspex.com](mailto:maspex@maspex.com)

**Website Administrator** – MGD MWS Sp. z o.o. Sp. k. with registered office in Wadowice, address: 34- 100 Wadowice, Legionów 37 Street, entered into the register of entrepreneurs of the National Court Register under number KRS 0000271001 whose registration files are kept by the District Court for Kraków - Śródmieście in Kraków, 12<sup>th</sup> Economic Department of the National Court Register, NIP (tax identification number): 5511702355, REGON (Polish business registry number): 070768005.

**Contact details of the Website Administrator:** [internet@maspex.com.pl](mailto:internet@maspex.com.pl)

**Personal data** – all information about a natural person, who is identified or identifiable by means of one or more specific factors determining physical, physiological, genetic, psychic, economic, cultural or social identity, including IP of a device, localisation data, internet identifier and information gathered via cookie files and other similar technologies.

**GDPR** – 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.

**Company from the Personal Data Controller's Group** – a company economically and/or capially and/or personally related to the Personal Data Controller.

**User** – every natural person visiting the Website and/or using computer communicators (chatbots) and administered by the Website Administrator.

**Counterparty** – a natural person, who contacts the Personal Data Controller and/or a Company from the Personal Data Controller's Group in order to undertake activities aimed at entering into agreement/cooperation and/or executing an agreement/cooperation.

**Contact Person** – the Counterparty's employee, representative and/or a contact person appointed by the Counterparty for execution of cooperation/agreement concluded between the Counterparty and/or Personal Data Controller and/or a Company from the Personal Data Controller's Group, as well as a person used/to be used by the

Counterparty for execution of cooperation/agreement with Personal Data Controller and/or a Company from the Personal Data Controller's Group.

## **II. Personal Data processing**

### **1. Principles of Personal Data processing**

**If you have not received another information clause on Personal Data processing from a Company from the Personal Data Controller's Group, your Personal Data Controller is: GRUPA MASPEX Sp. z o.o. Sp. k. with registered office in Wadowice, Legionów 37 Street, 34-100 Wadowice and the principles of Personal Data processing by the Personal Data Controller are described in this Privacy Policy.**

Personal Data are processed in compliance with respective applicable provisions of GDPR.

The Personal Data Controller applies technical and organisational means ensuring security of Personal Data processing and protection of Personal Data against their disclosure to unauthorised persons, their acquisition by unauthorised persons, processing in breach of respective legal provisions on personal data protection and their change, loss or destruction.

The Personal Data Controller does not transfer Personal Data to any third parties, that is outside the EEA (European Economic Area) or to international organisation, subject to Personal Data processing for the purpose of direct marketing. Personal Data may be disclosed to IT service providers in the US, that are subject to certification under the Privacy Shield, that is in compliance with article 45 sec.1 of GDPR.

If Personal Data are to be transferred outside the EEA for other purposes than direct marketing, they shall be transferred on the basis of legal grounds specified in articles 44-49 of GDPR upon prior notification of respective data subjects.

Personal data are not subject to automated decision making, including profiling.

### **2. Purposes and legal grounds of Personal Data processing and period of Personal Data processing**

The Personal Data Controller may process Personal Data for the following purposes:

#### **a) for the purpose of communication, identification and replies to User's inquiries via the Website**

The User has the possibility to contact the Website Administrator and/or the Personal Data Controller by means of electronic contact forms available on the Website. To be able to use the form, a User is required to provide Personal Data necessary for contact with the User and for reply to an inquiry. In the contents of an inquiry, the User may also provide other data to facilitate contacts or handling of an inquiry.

Personal Data are provided on voluntary basis, but if they are not provided, communication and handling of an inquiry will not be possible.

Personal Data are processed for the above mentioned purpose on the basis of the User's consent, that is article 6 sec. 1 letter a of GDPR. The User's Personal Data will be processed for a period necessary for a reply to an inquiry to be given.

**b) for the purpose of communication, identification and replies to User's inquiries via other forms of contact**

In case of contact via general e-mail addresses or phone numbers to secretariats of the Personal Data Controller and/or Companies from the Personal Data Controller's Group, including the Customer Service Department, the Personal Data Controller processes personal data in order to facilitate contacts and provide a reply to an inquiry.

Personal Data are processed for the above mentioned purpose on the basis of the legitimate interest of the Personal Data Controller, that is article 6 sec. 1 letter f of GDPR. The User's Personal Data will be processed for a period necessary for a reply to an inquiry to be given.

**c) to handle complaints**

If a complaint about the Products from the offer of the Personal Data Controller is lodged via:

- a) electronic contact forms or via functionalities available on the Website;
- b) general e-mail addresses or phone numbers to secretariats of the Personal Data Controller and/or Companies from the Personal Data Controller's Group;
- c) stores,

Personal Data Controller shall process Personal Data for purpose of examination of a complaint.

Personal Data are processed on the basis of fulfilment of a legal obligation, that is article 6 sec. 1 letter c of GDPR and the legitimate interest of the Personal Data Controller, that is article 6 sec. 1 letter f of GDPR meaning the pursuit of possible claims of the Personal Data Controller and/or Companies from the Personal Data Controller's Group and defence against such claims.

Personal data will be processed for a period necessary for examination of a complaint, period of limitation of claims under complaints and a period necessary for protection against claims of a claimant.

**d) for the purpose of direct marketing**

The Personal Data Controller may process Personal Data for the purpose of direct marketing of the products included in the commercial offer of the Personal Data Controller (hereinafter: the Products). The current list of Products is published on website: [www.maspex.com](http://www.maspex.com).

Personal data may be also processed for marketing purposes by means of computer chatbots.

Personal Data are provided on voluntary basis.

Personal Data are processed for the purpose of direct marketing on the basis of the legitimate interest of the Personal Data Controller in form of promotion of the products from own offer, that is article 6 sec. 1 letter f of GDPR.

The User's Personal Data will be processed until an objection to processing of Personal Data for marketing purposes is raised.

If Personal Data are processed via chatbots used for communication and promotion of products from the offer of the Personal Data Controller, Personal Data of the User are processed on the basis of his/her consent, that is article 6 sec. 1 letter a of GDPR.

Personal data in chatbots will be processed for a period of the programme's availability for the User or until the User withdraws his/her consent.

**e) to undertake activities aimed at entering into an agreement/cooperation and or/execution of an agreement/cooperation**

The Personal Data Controller may receive Personal Data of Counterparties directly from Counterparties or from a Company from the Personal Data Controller's Group, with whom the Counterparty cooperates and/or has entered into an agreement, and in case of Personal Data of Contact Persons – directly from such persons, the Counterparty of a Company from the Personal Data Controller's Group, with whom the Counterparty cooperates and/or has entered into an agreement.

The Personal Data Controller may process the following Personal Data of Counterparties/Contact persons: name and surname, address of registered office/place of business activity, another specified address, phone number, e-mail address, NIP (tax identification number), PESEL (Polish resident identification number), identity document number, driving licence number, registration number of a vehicle or other data necessary for conclusion and/or execution of an agreement/cooperation.

Above mentioned personal data will be processed only in the scope necessary for conclusion/execution of an agreement and in compliance with the principle of adequacy.

Disclosure of Counterparties' Personal Data is a necessary condition for conclusion and execution of an agreement and/or commencement of cooperation, and in case of Contact Persons it is voluntary.

The Personal Data Controller processes Personal Data of Counterparties and/or Contact Persons for the purpose and for the period of:

- 1) Personal Data of Counterparties: the purpose for conclusion and execution of an agreement, that is pertaining to article 6 sec. 1 letter b of GDPR, Personal Data will be processed for duration of cooperation and/or an agreement;
- 2) Personal Data of Contact Persons: the purpose for execution of cooperation/agreement concluded with a Counterparty, in particular for the purpose of contact, that is in legitimate interest of the Personal Data Controller and/or Companies from the Personal Data Controller's Group - article 6 sec. 1 letter f of GDPR, Personal Data will be processed for duration of cooperation and with a Counterparty/or a term of an agreement concluded with a Counterparty;
- 3) Personal Data of Counterparties and/or Contact Persons for pursuit of possible claims by the Personal Data Controller and or a Company from the Personal Data Controller's Group in relation to default under an agreement/cooperation and/or wrongful acts, as well as for defence against such claims, that is in legitimate interest of the Personal Data Controller and/or a Company from the Personal Data Controller's Group, that is article 6 sec. 1 letter f of GDPR, Personal Data will be processed for duration of cooperation/a term of an agreement and a period equal to the period of limitation of possible claims in relation to default under an

- agreement/cooperation and/or wrongful acts;
- 4) Personal Data of Counterparties and/or Contact Persons for maintenance of ledgers and other accounting documents, that is in legitimate interest of the Personal Data Controller and/or a Company from the Personal Data Controller's Group, that is article 6 sec. 1 letter f of GDPR, Personal Data will be processed for a periods required by the legal provisions that impose specific obligations entailing Personal Data processing;
  - 5) Personal Data of Counterparties and/or Contact Persons: for marketing purposes, that is for the purpose of presentation of commercial offers and information on products included in the offer of the Personal Data Controller, that is in legitimate interest of the Personal Data Controller, that is article 6 sec. 1 letter f of GDPR, Personal Data will be processed until objection to Personal Data processing for marketing purposes is raised.

**f) for the purpose of adjustment of the contents of the Website to preferences of the User and communication with the User, optimisation of use of the Website, for the purpose of generation of statistics, presentation of advertisements, introduction of questionnaires and detection of bots and abuse in services of analysis of marketing tool operations.**

Processing of the User's Personal Data for above purposes will be necessary for purposes related to the legitimate interest of the Administrator, that is to ensure correct operation of the Website and perform promotional and marketing activities, include to take account of the characteristics of recipients in performed activities, and to protects the Website against attempts of illegal interference with the Websites, e.g. attempts to hack the Website by unauthorised persons, that is article 6 sec. 1 letter f of GDPR.

Personal Data will be processed until a data subject raises an objection, due to reasons related to his/her particular situation, to processing of his/her personal data, including for marketing purposes.

The Personal Data Controller achieves the above purpose by means of, for instance, cookie files that are described in detail in Chapter III – Cookie Policy.

### **3. Recipients of Personal Data**

Personal Data may be disclosed:

- a) in the scope specified in clause 2 letters a and b to authorised employees and associates of the Personal Data Controller, the Website Administrator and its authorised staff, a Company from the Personal Data Controller's Group, who – due to the scope of his/her activities is competent to reply to an inquiry, entities that render services, including maintenance and technical support servers for applications, computer programmes, IT systems and the Website, where Personal Data are processed, entities authorised to receive personal data by law,
- b) in the scope specified in clause 2 letter c to authorised employees of the Personal Data Controller, persons authorised by the Personal Data Controller, associates of the Personal Data Controller, Companies from the Personal Data Controller's Group that are producers and/or distributors of advertised products and their authorised staff; Companies from the Personal Data Controller's Group that have received a complaint and their authorised staff; insurers, insurance brokers, entities rendering marketing services that cooperate with the Personal Data Controller and/or entities appointed by the Personal Data Controller for handling of a complaint, state authorities, if such obligation is imposed by law;

- c) in the scope specified in clause 2 letter d: to Companies from the Personal Data Controller's Group and their authorised staff; marketing, advertising agencies, media houses cooperating with the Website Administrator or a Company from the Personal Data Controller's Group, entities that render services for the Personal Data Controller (Companies from the Personal Data Controller's Group), in particular entities that render IT services, entities rendering transportation, postal, courier, consulting services and supporting the Personal Data Controller (Companies from the Personal Data Controller's Group) in pursuit of claims, in particular: law offices, tax offices, debt collection companies, auditors, insurers, insurance brokers and authorised employees or associates of the above mentioned staff;
- d) in the scope specified in clause 2 letter c to authorised employees and associates of the Personal Data Controller, Companies from the Personal Data Controller's Group and their authorised staff, entities that render services for the Personal Data Controller and/or a Company from the Personal Data Controller's Group, including entities used by the Personal Data Controller and/or a Company from the Personal Data Controller's Group to perform an agreement, in particular entities that render IT services, entities rendering transportation, postal, courier, consulting and supporting services for the Personal Data Controller and/or a Company from the Personal Data Controller's Group in pursuit of claims, in particular: law offices, tax offices, debt collection companies, auditors, insurers, insurance brokers and authorised employees of the above mentioned entities; entities authorised to receive personal data under generally applicable legal provisions;
- e) in the scope specified in clause 2 letter f to the Companies from the Personal Data Controller's Group and their authorised staff, service providers, including maintenance and technical support services for applications, computer programmes, IT system and the Website, where the Personal Data are processed, partners of the Website Administrator and/or the Personal Data Controller and/or a Company from the Personal Data Controller's Group.

#### **4. Rights related to Personal Data processing**

A data subject has the right to:

- a) review the contents of their Personal Data;
- b) rectify their Personal Data;
- c) delete their Personal Data;
- d) restrict processing of their Personal Data,
- e) right to demand a transfer of their Personal Data.

A data subject has a right to lodge a complaint on Personal Data processing to a supervisory authority, which in Poland is: the Chairperson of the Personal Data Protection Office.

If Personal Data are processed by the Personal Data Controller for the purpose of execution of a reasonable interest of the Personal Data Controller or a third party, a data subject may raise an objection to processing of their personal data due to reasons related to their particular circumstances.

If Personal Data are processed for the purpose of marketing of products in the offer of the Personal Data Controller, data subject may raise an objection to processing of their Personal Data for marketing purposes.

If Personal Data processing is based on consent, a data subject concerned may withdraw the consent on Personal Data processing without impact on legitimacy of processing on the basis of such consent before its withdrawal.

The above mentioned rights may be exercised only in compliance with respective provisions of GDPR.

In case of submission of a request related to exercising of rights related to processing of Personal Data, Personal Data will be processed for the purpose of examination of a request and documenting of its handling. The legal ground of processing consists of the legitimate interests of the Personal Data Controller that is a need to examine a request and ensure accountability in relation to its examination, that is article 6 sec. 1 letter f of GDPR. Personal Data will be processed for a period enabling execution of such interest or until an effective objection is raised to Personal Data processing for the above mentioned purpose.

The **Data Protection Officer** shall be the contact person of the Personal Data Controller in all issues related to personal data processing, also for the purpose of exercising of all foregoing rights:

Contact details of the Data Protection Officer:

**Correspondence address:**

**Data Protection Officer**, Chopina 10 Street, 34-100 Wadowice

For marketing purposes:

[iodmarketing@maspex.com](mailto:iodmarketing@maspex.com)

Product complaints:

[iodreklamacje@maspex.com](mailto:iodreklamacje@maspex.com)

For Counterparties/Contact Persons:

[iod@maspex.com](mailto:iod@maspex.com)

For the purpose of contact:

[iodkontakt@maspex.com](mailto:iodkontakt@maspex.com)

### **III. Cookie Policy**

Cookie files are used for rendering of highest quality services, including in the way adjusted in to individual needs. If you use the website without change of cookie settings, cookies will be placed in the terminal equipment. Cookie settlings may be changed any time.

Cookies files are IT data, in particular text files that are stored in the terminal equipment of a Website user and used when websites are used. Cookie files usually contain the name of a website, from which they come from, period of their storage on the terminal equipment and data assigned to them (such as e.g. a unique number).

Besides the Website Administrator and/or the Personal Data Controller, also entities cooperating with the Website Administrator and/or the Personal Data Controller, such as Partners rendering analytical services, advertisers, authors of applications, chain advertising agencies may place and use information in user's terminal equipment and.

The Website may place cookie files in a browser if it enables such function. What is important, a browser makes it possible for the website to access only the cookie files that were places by that website, and not files placed by other websites.

The Websites administered by the Website Administrator used the cookie files in order to:

- adjust the contents and application to user preferences and optimise use of the website (e.g. cookie files enable recognition of user's equipment and appropriate display of the website adjusted to their individual needs, e.g. resolution of a browsers, language preferences, font size);

- generation of statistics to be analysed in order to improve the infrastructure and contents of the service and application (e.g. correction of website elements resulting from technical errors of the website, correction of user path to ensure that the user receives required contents as soon as possible);
- maintaining user session (after logging), thanks to which a user does not need to type log ID and password on every page of the website;
- presentation of advertisements, e.g. in the way reflecting user's interests or their place of residence (individualisation of advertisements), and in order to avoid situation, when too many advertisements are displayed to one user;
- executing questionnaires – in particular in order to avoid multiple presentation of a questionnaire to the same user and to present questionnaires in a way that take into account interests of users;
- detecting bots and abuse of services (e.g. hacking of the website).

Due to life cycle of cookie files, the website uses two major types of files:

- session files – temporary files stored in the user's terminal equipment until a user logs out, leaves the website and the application, or switches of the software (internet browser);
- permanent files – stored in the user's terminal equipment for a definite duration specified in the parameters of cookie files or until they are deleted by the user.

Due to the purpose of cookies files, the website uses the following types of them:

- necessary for operation of the service and application – enabling use of the services, e.g. authenticating cookie files used in case of services that need authentication;
- used for ensuring security, e.g. used for detection of abuse related to authentication;
- performance files – enabling collection of information on the manner, in which websites and applications are used;
- functional – enabling “storage” or settlings selected by the user and personalisation of the user's interface, e.g. in case of a selected language or region of origin of the user, font size, appearance of a website and application, etc.;
- advertising – enabling provision of advertising content that is more adjusted to interests of users;
- statistical – used for calculation of statistics related to websites and applications.

In numerous cases the software used for browsing of website (a browser) allows storage of information in form of cookie files in the user's terminal equipment as default settings. But the user may change such settlings any time. If they do not, it means that the above mentioned information may be placed and stored in their terminal equipment, and at the same time the website will store information in the user's terminal equipment and obtain access to such information.

Cookie files may be managed by the user on their own on the level of a browser used by the user.

The most popular browsers offer, for instance, the possibility to:

- accept handling of cookie files, which makes it possible for the user to fully use options offered by websites;
- manage cookie files on the level of single websites selected by the user;
- determine settlings for various cookie files, e.g. accept permanent files as session files, etc.;



- block or delete cookie files.

Comprehensive information is available in software (browser) settings or in section help in a browser menu. Restrictions or exclusion of cookie files and other similar technologies may have impact on some functionalities available in our websites.

The list of Partners of the Website Administrator and/or the Personal Data Controller that may have access to cookies files, together with a link to principles of use of cookie files applied by the Partner:

<https://www.facebook.com/policies/cookies/> <https://help.twitter.com/en/rules-and-policies/twitter-cookies> <https://yandex.com/legal/privacy/>  
<https://policy.pinterest.com/en/privacy-policy>  
<https://support.google.com/analytics/answer/7667196>  
<https://www.cloudflare.com/security-policy/> [https://kwit.pl/polityka prywatnosci](https://kwit.pl/polityka-prywatnosci)  
<http://www.listonic.com/content/pl/polityka-prywatnosci/>

#### **IV. Amendment of the Privacy Policy**

The Privacy Policy is verified on ongoing basis and updated, when necessary.