

“sprawny.marketing spółka z ograniczoną odpowiedzialnością” guarantees the security of data, including personal data, of users visiting the website <https://sprawnymarketing.pl>. The information provided below guarantees the confidentiality of personal data and their proper use. In order to make the Privacy and Cookies Policy more accessible, the term “User” has been replaced by “you” and “Administrator/Controller” by “we.” In addition, we have introduced sub-headings to make it easier for you to find the information you are interested in. This Privacy and Cookies Policy covers, in particular, the website <https://sprawnymarketing.pl> belonging to the company “sprawny.marketing spółka z ograniczoną odpowiedzialnością” and all other websites in this domain, of which we are the owner (hereinafter “Website” or “Websites”). In this Policy, we will refer to 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), which we will refer to as “GDPR” for short.

Personal data controller

“sprawny.marketing spółka z ograniczoną odpowiedzialnością” with its registered office in Poznań at ul. Chełmońskiego 8/4, 60-754 Poznań, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court Poznań – Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register, under KRS number 0000313890, NIP 7773078143, REGON 300905973, is the controller of your personal data. You can also contact us at the e-mail address: oliwia.krzywdzinska@sprawnymarketing.pl or the telephone number: +519 183 555.

Data Protection Officer

The controller has appointed a Data Protection Officer who can be contacted on data protection matters at the following e-mail address: rodo@sprawnymarketing.pl.

Personal data we collect

The provision of personal data is voluntary, but if you wish to use our services, it is necessary for the conclusion and performance of the contract. If required by law, we may request you to provide other data necessary, for example for accounting or tax reasons. Apart from these cases, the provision of data is voluntary. We collect information about you from various sources:

Information you provide us with

If you use the newsletter service, we process the following personal data:

1. e-mail address,
2. name.

We process personal data in this case on the basis of your consent, i.e. Article 6(1)(a) GDPR. If, for some reason, you do not provide these personal data, we will not be able to conclude a contract with you, and you will not be able to use the newsletter service.

If you make a transaction, we process the following personal data:

1. name,
2. surname,

3. mailing address,
4. e-mail address,
5. telephone number,
6. company name,
7. NIP (taxpayer identification number).

If, for some reason, you do not provide these personal data, we will not be able to conclude a contract with you, and you will not be able to make use of our goods or services. If required by law, we may request you to provide other data necessary, for example for accounting or tax reasons. Apart from these cases, the provision of data is voluntary (the provision of your e-mail address and telephone number is voluntary).

We process the data necessary for the conclusion of a contract on the basis of Article 6(1)(b) GDPR. We process data that we collect in connection with the performance of our accounting and tax obligations on the basis of accounting law, tax law and Article 6(1)(c) GDPR. We may also process the data in order to assert and defend against claims on the basis of our legitimate interest, i.e. Article 6(1)(f) GDPR. We collect the contact data provided additionally on the basis of your consent, i.e. Article 6(1)(a) GDPR. In addition to the information necessary for the conclusion and performance of a possible contract, you also provide us with:

1. Information derived from correspondence: you will share some personal data if you contact us by e-mail, by using the contact forms provided on the Website or by traditional mail, fax or other offline means.
2. Information from surveys: if you participate in any surveys, you will share some personal data as part of your answer, unless you answer anonymously.
3. Information you share in your posts: you may share personal data when you post comments on the Website or participate in a general discussion.
4. Information you provide during a chat on the Website (e-mail address, name and other information that may appear): depending on what data you provide to us during the chat. We process personal data on the basis of our legitimate interest in conducting the chat, i.e. Article 6(1)(f) GDPR.

Information we collect automatically

We collect some information automatically as a result of you using the Website, as described in the section on Cookies. This information includes, but is not limited to:

1. the Internet Protocol (IP) address of the device from which you are accessing the Website (this may sometimes be used to obtain information about the country or city in which you are using the platform),
2. the address of the page visited immediately before visiting the Website,
3. specific actions taken on the Website, including pages visited, streaming, connecting to a Facebook or Google+ account, posting a comment or conducting a search,
4. any search terms you may have entered on the Website,
5. the timing, frequency and length of your visits to the Website,
6. the type of your browser and operating system,

7. the type of device from which you are accessing the Website – for example, whether you are accessing the Website from a personal computer or a mobile device – and your device identifier (ID),
8. information collected through cookies and similar technologies, as described in the section on Cookies,
9. information about your interactions with e-mails, for example, whether you open them, click on them or forward them.

How do we use your data?

Your personal data will be processed for the following purposes:

1. Making our goods and services available to you for your use. The legal basis for this processing is that it is necessary for us to enter into a contract with you and to perform the contract, i.e. Article 6(1)(b) GDPR.
2. Managing and improving our business, by which we mean in particular managing and improving the Website, bettering our offer, and detecting and preventing financial and other fraud. The legal basis for this processing is our legitimate interest, i.e. Article 6(1)(f) GDPR.
3. Personalizing the content provided to you, by which we mean personalization of the offers addressed to you and the advertisements you see on the Website – in this case, depending on the specific situation, the legal basis for data processing may be your consent or our legitimate interest, i.e. Article 6(1)(a) GDPR or Article 6(1)(f) GDPR.
4. Contacting and interacting with you, by which we mean responding to queries addressed to us, comments, etc. In this case, depending on the specific situation, the legal basis for data processing may be your consent or our legitimate interest, i.e. Article 6(1)(a) GDPR or Article 6(1)(f) GDPR.
5. Dispute resolution and handling of complaints or claims, by which we mean the handling of complaints, legal claims or disputes involving you or us – in this case, depending on the specific situation, the legal basis for data processing may be the performance of a contract or our legitimate interest, i.e. Article 6(1)(b) GDPR or Article 6(1)(f) GDPR.
6. Fulfilment of obligations imposed on us by law, for example tax law – in this case, the legal basis for data processing is that the processing is necessary for the fulfilment of a legal obligation incumbent on us, i.e. Article 6(1)(c) GDPR.

Information for users of social networking sites

In the case of social networks, personal data will be processed in order to carry out communication and promotion within the controller's fanpage and channels on Facebook, Instagram and YouTube, in particular responses to reactions, comments and private messages, as well as for statistical and advertising purposes carried out through advertising tools within the indicated platforms. The processing is carried out on the basis of our legitimate interest as the controller, which is to ensure the continuity of business communications, to market our own products, to take care of our brand image, and to search for employees or contractors. Marketing information may also be provided to you on the basis of your consent. In this case, you can withdraw your consent at any time by contacting us by e-mail or in writing. The withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal.

The recipients of your personal data may only be those who are entitled to receive them under the law. In addition, your data are shared with Meta Platforms Ireland Limited (detailed information below). Personal data are stored until you object or the purposes of the processing ceases. The provision of data is voluntary and is done through the use of the controller's fanpage.

Information about the co-management of data with Meta Platforms Ireland Limited: sprawny.marketing sp. z o.o. and Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) are joint controllers of your data in accordance with Article 26 GDPR with regard to the processing of data for statistical and advertising purposes. The co-management includes the aggregate analysis of data for the purpose of displaying statistics on the activity of the controller's fanpage users.

Responsibilities of Meta Platforms Ireland for processing your data for the purposes indicated:

- having a legal basis for processing data for the purposes of site statistics;
- ensuring the exercise of data subjects' rights;
- reporting violations to the supervisory authority and notifying those affected of the incident;

making sure that appropriate technical and organizational measures are in place to ensure the security of your data.

Our responsibility for processing your data:

- having a legal basis for processing data for statistical purposes;
- fulfilling our information obligations with regard to the purposes of the processing carried out by us.

Sharing your data

We can and most likely will share your personal data with:

1. suppliers providing us with IT and network infrastructure,
2. providers of hosting, IT, text messaging and newsletter services,
3. suppliers of the technologies used by the Website,
4. providers of accounting and tax services,
5. other entities insofar as this is necessary for the purposes of data processing.

We may also share your data in the following circumstances:

1. if the law or a public authority determines that we must share personal data, or for the purposes of the judiciary;
2. if we need to share personal data in order to establish, exercise or defend our rights (this includes sharing personal data with others to prevent fraud);
3. in the event of restructuring, sale or transfer of the business (or part of it), for example in connection with an acquisition or merger.

In each case, we will share as little of your data as possible in order to fulfil the purpose of the processing and to fulfil our obligations.

Your rights

You have the right to:

1. access the content of your personal data,
2. rectify your data,
3. data erasure,
4. restrict the processing of your data,
5. data portability,
6. withdraw your consent (where processing is based on consent) at any time without affecting the lawfulness of the processing carried out on the basis of the consent before its withdrawal. The consent can be withdrawn at any time.

You have the right to object at any time – on grounds relating to your particular situation – to the processing concerning your personal data based on our legitimate interests. If you lodge an objection, we will no longer be allowed to process those personal data unless we demonstrate the existence of significant legitimate grounds for the processing which override your interests, rights and freedoms, or grounds for establishing, asserting or defending claims. If your personal data are processed for the purposes of direct marketing, you have the right to object at any time to the processing concerning your personal data for such marketing, to the extent that the processing is related to such direct marketing. If you lodge an objection to the processing for the purposes of direct marketing, we will not be allowed to process your personal data for such purposes. You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place where the alleged infringement was committed, if you believe that the processing of personal data concerning you is in breach of the law. A list of supervisory authorities is available at the link: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm. In Poland, the supervisory authority is the President of the Personal Data Protection Office. In order to exercise your rights, please contact us.

International data transfers

Personal data may be transferred to and stored at a destination outside the European Economic Area (“EEA”). They may also be processed by entities operating outside the EEA that work for us or for one of our subcontractors. In such a case, we ensure that your right to privacy is respected. In such cases, transfer to a third country is most often carried out on the basis of:

a European Commission decision declaring an adequate level of protection,

or, where an adequate level of protection has not been established by a decision of the European Commission in this respect, the data will be adequately protected by standard protection clauses as referred to in the Commission Decision of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council, available at the link:

https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=uriserv%3AOJ.L_.2021.199.01.0031.01.POL&toc=OJ%3AL%3A2021%3A199%3ATOC.

You can obtain a copy of your personal data transferred to a third country. To do so, please contact us.

Data retention period

We keep your personal data for the duration of the contract you have concluded with us and also after the contract has ended for the following purposes:

1. assertion of claims in connection with the performance of the contract,
2. compliance with legal obligations, including in particular tax and accounting obligations,
3. prevention of fraud and abuse,
4. statistics and archiving,
5. no longer than for the period until the expiry of the statute of limitations for claims which may be asserted against us or to which we are entitled.

Personal data processed on the basis of our legitimate interest will be kept for the duration of the contract or until the cookies expire, or until you object to such processing, whichever occurs first. Personal data processed on the basis of your consent will be processed for a period of three (3) years after you have given your consent or until you withdraw your consent, whichever occurs first.

Minors

The Websites are not intended for children. Minors are not permitted to use the Websites. We do not intentionally collect any personal data of minors or allow minors to use the Websites. If we become aware that we are collecting personal data of a minor, we will delete those data immediately. If you have a reason to believe that we may have collected such personal data, please contact us directly immediately.

Cookies

To facilitate the use of our Website, we use “cookies.” Cookies are small text files that a website places on your hard drive or in your browser. A cookie typically contains the name of the website from which it originated, the “lifespan” of the cookie (i.e. the length of its existence), and a randomly generated unique number used to identify the browser from which the website is being accessed.

What do we use cookies for?

We use cookies for the following purposes:

1. to provide you with access to the goods and services you are looking for on our Websites;
2. to improve our Websites, goods and services;
3. to ensure security on our Websites;
4. to better present our goods and services for marketing purposes using anonymized and pseudonymized data;
5. and, if you have given additional consent, to personalize the offer and content of the Websites for you, in particular through remarketing.

Depending on the criterion, cookies can be divided into different types

Based on the length of time cookies are placed on your end device, we distinguish between the following types of cookies:

1. session cookies – stored on your telecommunications end device, for example a telephone, laptop, or tablet, but only for as long as you remain on our Website, i.e. until you close your browser or log off from the Website;
2. permanent cookies – stored on your telecommunications end device, for example a telephone, laptop or tablet, but only for a limited period or until you delete them.

By origin, the following types of cookies can be distinguished:

1. first party cookies – cookies placed directly by us when you visit the Websites;
2. external cookies (third-party cookies) – by using our Websites you may receive cookies from third party contributors who provide services to us.

We also distinguish between cookies on the basis of their necessity for the service:

1. essential cookies – they are strictly necessary for the proper functioning of the Website or the functionality you wish to use;
2. functional cookies – they allow us to analyze how you use the Website, for example which links you click on and which browser settings you use;
3. advertising/business cookies – they allow us to better evaluate the effectiveness of our advertising and marketing efforts. These cookies come from our partners whose services we use to analyze and track visits to the Website and the effectiveness of the advertising used. We do not share your personal data with those service providers except for the data collected directly by the advertising/business cookies. Please be aware that data collected in this way may be combined with data collected in other ways by our suppliers. Such external processing will be subject to the privacy policies of our partners.

Below you will find a description of the cookies that our Websites use and how you can disable their use.

Our cookies (essential cookies)

These cookies are closely linked to the operation of the Website and allow, among other things, the correct display of the Website, logging in or placing purchases in the shopping cart.

Wistia

Our Websites use the *Wistia* service. Wistia tracks how you use the videos available through the Websites: how long you watch a particular video, at which point you pause or start rewinding, etc. For some videos, we may pause playback and ask you to provide your name or e-mail address. You are not obliged to provide those data, however, we reserve the right to make certain videos available only to identified users. Wistia combines the data collected through the videos, including names and e-mail addresses, and makes the information collected in this way available

to us. Apart from that, Wistia does not sell or otherwise make available to third parties the data collected through the videos available on the Websites. We use such collected data to improve the quality of the videos made available on the Websites. Opt-out: you can configure your browser not to use any cookies. Opting out may have a negative impact on the operation and functionality of the Website.

Google Analytics (functional cookies)

Our Websites use the Google Analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). Google will analyze your use of the Website so that we can improve the Website. The information collected by Google in connection with your use of the Website (for example: pages visited, language settings, operating systems used) will be transmitted to a Google server located in the USA, where it will be stored and analyzed. The relevant results will then be made available to us in anonymized form. The data collected will not be associated with your full IP address as part of this process. We have activated the IP anonymization function offered by Google, which will remove the last 8 digits (IPv4 type) or the last 80 bits (IPv6 type) from your IP address. The data transfer is based on standard contractual clauses approved by the European Commission. More information is available at <https://policies.google.com/privacy/frameworks?hl=pl>. Additional information about the Google Analytics service is available on the following pages: [Google Analytics Terms of Use](#), [Privacy and Data Protection Guidelines of Google Analytics](#) and [Google Privacy Policy](#). Opt-out: you can download and install a plugin in your browser to disable Google Analytics cookies. The plugin is available at the [link](#).

Google AdWords (advertising/business cookies)

Our Websites use [Google AdWords](#) to advertise our products and services online. AdWords will display advertisements on other sites you visit based on what part of the Websites you have viewed. This will use cookies that will be placed on your device. These cookies DO NOT IN ANY WAY ALLOW US TO IDENTIFY YOU OR TO GAIN ACCESS TO YOUR DEVICE. To find out more about Google’s privacy policy click [here](#). Opt-out: in order to opt-out of these cookies click on [Google’s Ad Settings](#) link and follow the instructions.

Google DoubleClick (advertising/business cookies)

Our Websites use [Google DoubleClick](#) cookies, which allow us to control how often a particular advertisement is displayed in your browser, how long it takes for the ad to appear in your browser, and how long the ad is allowed to be displayed in your browser. Based on this, we can assess the effectiveness of our ads. Opt-out: in order to opt-out of these cookies, click on [Google’s Ad Settings](#) link and follow the instructions.

Vimeo (functional cookies)

Our Websites use the Vimeo service provided by Vimeo, Inc., which allows us to make videos available to you on the Website. To find out more about them, please see the [Cookie Policy](#) and [Privacy](#) of the service. Opt-out: in order to opt-out of these cookies, click on the [Opt-out](#) link and follow the instructions.

Facebook Pixel

Our Websites use the Facebook Pixel service provided by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). This service allows us to track your behavior after you have seen or clicked on a Facebook-sourced advertisement. This service is designed to assess the impact of Facebook-sourced advertising for statistical and market research purposes, and helps us to improve our future advertising. The data collected in this way are anonymous and do not allow us to determine your identity. However, these data are collected and processed by Facebook and may be linked to your Facebook profile and then used by Facebook for its own advertising purposes under the terms of Facebook’s Privacy Policy available [here](#). In connection with the Facebook Pixel, a cookie may be placed on your device. Opt-out: to deactivate the Facebook Pixel, click on the link: [Opt-out](#). Comprehensive information is available in your software (browser) settings.

Details for those using individual web browsers, among others:

1. [Internet Explorer](#)
2. [Mozilla Firefox](#)
3. [Chrome](#)
4. [Opera](#).

To disable cookies on mobile devices, depending on the operating system installed, click on the appropriate link below and follow the instructions:

1. [Android](#)
2. [iOS](#)
3. [BlackBerry](#)
4. [Windows Phone](#).

To disable cookies on mobile devices, depending on the operating system installed, click on the appropriate link below and follow the instructions:

1. [Android](#)
2. [iOS](#)
3. [BlackBerry](#)
4. [Windows Phone](#).

Please be advised that restricting or disabling the use of cookies and other similar technologies may affect some of the functionalities available on the Websites.

Additional information

Additional information on cookies and other technologies can be found, among others, at [allaboutcookies.org](#), [youonlinechoices.com](#) or in the Help section of your browser menu. You can also ask us directly for more information.

Web Push notifications

Web Push notifications are only sent to your web browser if you have consented to receive them. In order to give your consent to receive Web Push notifications, you should tick the “display notifications” option or a similar option in the message sent by your web browser (each browser may call this option differently). Your consent to receive Web Push notifications can be revoked at any time by changing the settings of your web browser. We do not process any of your personal data in connection with your use of Web Push notifications. You are identified solely on the basis of information that is stored by your web browser. We do not have access to this information.

Changes to the privacy and cookies policy

We reserve the right to change and update this privacy and cookies policy. We will promptly notify users of the Websites about any changes. If you continue to use the Websites after changes have been made, you accept the revised policy. If the changes are significant, we may provide a clearer notice or seek to obtain your consent as required by law. Effective date of this privacy and cookies policy: 28.01.2020.

Details of the service administrator

sprawny.marketing sp. z o.o.
ul. Chełmońskiego 8/4
60-574 Poznań
Poland
NIP: PL 7773078143
REGON: 300905973

District Court Poznań – Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register, KRS No. 000313890. Share capital: PLN 102,000

e-mail: faktury@sprawnymarketing.pl

telephone: +48 519 183 555

Read more at: <https://sprawnymarketing.pl/polityka-prywatnosci/>