

EQUIAGENT.COM WEBSITE PRIVACY POLICY

CONTENTS:

1. GENERAL PROVISIONS
 2. BASIS OF DATA PROCESSING
 3. PURPOSE, BASIS AND PERIOD OF DATA PROCESSING ON THE WEBSITE
 4. DATA RECIPIENTS ON THE WEBSITE
 5. PROFILING ON THE WEBSITE
 6. RIGHTS OF DATA SUBJECT
 7. COOKIES ON THE WEBSITE AND ANALYTICS
 8. FINAL PROVISIONS.
-

1) GENERAL PROVISIONS

1. The present Website privacy policy is of strictly informative nature, which means it is not a source of liabilities for the Clients of the Website. The privacy policy covers, in the first place, rules concerning personal data processing by the Administrator on the Website, including the bases, purposes and period of data processing as well as the rights of data subjects and information on the use of cookie files and analytical tools on the Website.
2. The Administrator of personal data gathered through the agency of the Website is Beata Szumińska conducting business activity under the business name **BEATA SZUMIŃSKA**, registered in the Central Registration and Information on Business of the Republic of Poland kept by the minister competent for economy, with: place of business: ul. Mazowiecka 79, 05-502 Bobrowiec, and service address: ul. Obrzeźna 1/175 02-691 Warsaw, TIN: 1231266230, National Business Registry Number (REGON): 145919972, e-mail address: equiagent@wp.pl - hereinafter called "**Administrator**", who is, at the same time, the Service Provider of the Website.
3. Personal data on the Website are processed by the Administrator in compliance with the provisions of law in force, in particular in compliance with 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) - hereinafter called "GDPR" or "GDPR Regulation". The official text of the GDPR Regulation can be found at: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>
4. Using the Website, including conclusion of contracts, is voluntary. Likewise, it is voluntary for the Client using the Website to provide their personal data connected with it, save for two exceptions: (1) conclusion of agreements with the Administrator - failure to provide personal data necessary for the conclusion and execution of a contract for Electronic Service with the Administrator, in cases and within the scope indicated on the Website page, in the Website Regulations and in the present privacy policy, results in loss of possibility to conclude the contract in question. In such a case, providing one's personal data is a contractual requirement and if the data subject wants to conclude a given contract with the Administrator, they are obliged to provide the required data. Every time, the scope of data required to conclude a given contract is indicated beforehand on the Website page and in the Website Regulations; (2) Administrator's statutory obligations - providing personal data is a statutory obligation stemming from the generally applicable legal regulations that impose on the Administrator the obligation to process personal data (e.g. to process data in order to keep fiscal or account books) and failure to provide them precludes the Administrator from performing the aforementioned obligations.
5. The Administrator uses her best efforts in order to protect the interest of subjects of the processed data, in particular she is responsible for and guarantees that the data she collects are: (1) processed in compliance with the law; (2) collected for the indicated, legitimate purposes and not subject to further processing inconsistent with those purposes; (3) factually correct and adequate in relation to the purposes for which they are processed; (4) stored in a form enabling identification of data subjects, no longer than it is necessary in order to achieve the processing purpose, and (5) processed in a way that ensures proper safety of personal

data, including protection against illegitimate or unlawful processing as well as accidental loss, destruction or damage, with the use of adequate technological or organisational measures.

6. Taking into account the character, scope, context and purposes of processing, as well as the risk of infringement of rights or liberties of natural persons, of different probability and salience of threat, the Administrator implements adequate technical and organisational measures so that processing could take place in compliance with the present regulation and so that it could be demonstrated. If required, the above-mentioned measures are revised and updated. The Administrator applies technical measures that prevent electronically sent personal data from being sourced and modified by unauthorised persons.
7. All words, expressions and acronyms that appear in the present privacy policy and start with a capital letter (e.g. Service Provider, Website, Electronic Service) should be understood in accordance with their definition included in the Website Regulations available on the Website pages.

2) BASIS OF DATA PROCESSING

1. The Administrator is authorised to process personal data in cases when - and within the scope to which - at least one of the following conditions is met: (1) data subject expressed their consent for their data to be processed for one or more specified purposes; (2) processing is necessary for the execution of contract whose party is the data subject, or for taking up activities at the behest of the data subject before conclusion of the contract; (3) processing is necessary for the performance of the legal duty resting with the Administrator; or (4) processing is necessary for purposes stemming from the legitimate interest pursued by the Administrator or by a third party, with the exception of situations in which the interest, basic rights and liberties of the data subject, which require data protection, have priority over those interests, especially when the data subject is a minor.
2. Every time, data processing by the Administrator requires the occurrence of at least one of the bases indicated in point 2.1 of the privacy policy. Specific bases of processing personal data of the Website Clients by the Administrator are indicated in the next point of the privacy policy - with regard to a given purpose of processing personal data by the Administrator.

3) PURPOSE, BASIS AND PERIOD OF DATA PROCESSING ON THE WEBSITE

1. Every time, the purpose, basis and period as well as recipients of personal data processed by the Administrator stem from actions taken up by a given Client on the Website.
2. The Administrator can process personal data on the Website for the following purposes, on the following basis and for the following periods:

Purpose of data processing	Legal basis of data processing and period of data storage	Period of data storage
Execution of contract for Electronic Services or taking up actions on the behest of data subject before conclusion of the aforementioned contract	Article 6 paragraph 1 point (b) of the GDPR Regulation (execution of contract) - data processing is necessary for the execution of contract whose party is the data subject, or to take up actions on the behest of the data subject before conclusion of contract	Data is stored for the period necessary for the execution, termination or other expiration of the concluded contract for Electronic Services.
Direct marketing	Article 6 paragraph 1 point (f) of the GDPR Regulation (legitimate interest of the Administrator) - data processing is necessary for purposes stemming from legitimate interest of the Administrator - which consist in taking care of the interest and good image of the Administrator, her Website, and in pursuing to provide Electronic Services.	Data is stored for the period of existence of legitimate interest pursued by the Administrator, but no longer than for the period of limitation of the Administrator's claims against data subject, arising out of the business activity conducted by the Administrator. Period of limitation is specified by the regulations of law, especially of the Civil Code (basic period of limitation for claims connected with conducting business activity equals three years). The Administrator cannot process data for direct marketing purposes in case the data

		subject expresses effective objection in that respect.
Marketing	Article 6 paragraph 1 point (a) of the GDPR Regulation (consent) - data subject expressed their consent for their data to be processed by the Administrator for marketing purposes	Data are stored until the consent for further processing for that purpose is revoked by the data subject.
Keeping account books	Article 6 paragraph 1 point (c) of the GDPR Regulation in connection with Art. 74 paragraph 2 of the Law on accounting of 30 January 2018 (OJ of 2018, item 395) - data processing is necessary for the fulfilment of legal obligation resting with the Administrator	Data is stored for the period required by the regulations of law ordering the Administrator to store account books (for 5 years counting from the beginning of the year following the turnover year to which the data relate).
Using the Website page and ensuring its proper activity	Article 6 paragraph 1 point (f) of the GDPR Regulation (legitimate interest of the Administrator) - data processing is necessary for purposes stemming from legitimate interest of the Administrator - which consist in running and maintaining the Website page	Data is stored for the period of existence of legitimate interest pursued by the Administrator, but no longer than for the period of limitation of the Administrator's claims against data subject, arising out of the business activity conducted by the Administrator. Period of limitation is specified by the regulations of law, especially of the Civil Code (basic period of limitation for claims connected with conducting business activity equals three years).
Keeping statistical records and analysing Website traffic	Article 6 paragraph 1 point (f) of the GDPR Regulation (legitimate interest of the Administrator) - data processing is necessary for purposes stemming from legitimate interest of the Administrator - which consist in keeping statistical records and analysing Website traffic in order to improve the functioning of the Website and to increase the reach of the provided Electronic Services	Data is stored for the period of existence of legitimate interest pursued by the Administrator, but no longer than for the period of limitation of the Administrator's claims against data subject, arising out of the business activity conducted by the Administrator. Period of limitation is specified by the regulations of law, especially of the Civil Code (basic period of limitation for claims connected with conducting business activity equals three years).

4) DATA RECIPIENTS ON THE WEBSITE

1. In order to ensure proper functioning of the Website, including proper provision of Electronic Services by the Administrator, it is necessary for the Administrator to use services provided by third parties (such as software providers). The Administrator uses only services of processing entities that ensure sufficient warranties of implementation of adequate technological and organisational measure for the processing to meet the requirements of the GDPR Regulation and to protect the rights of data subjects.
2. Personal data can be communicated by the Administrator to a third country, whereby the Administrator guarantees that in such a case it will take place in relation to a country that ensures adequate degree of protection - compliant with the GDPR Regulation, and the data subject will have the possibility to obtain a copy of their data. The Administrator communicates the collected data only in cases and within the scope necessary to pursue a given purpose of data processing, compliant with the present privacy policy.
3. The Administrator does not communicate data in each case and to all recipients or categories of recipients indicated in the privacy policy - the Administrator communicates data only when it is necessary for the pursuance of a given purpose of data processing and only within the scope necessary for its pursuance.

4. Personal data of the Website Clients can be communicated to the following recipients or categories of recipients:
 - a. entities providing electronic payment or card payment services - in case of Clients who use electronic payments or card payments on the Website, the Administrator shares the collected personal data of the Client with a chosen entity that provides the aforementioned payment services on the Website on commission of the Administrator, within the scope necessary to provide the payment service executed by the Client.
 - b. providers of opinion poll system - in case of Clients who consented to express their opinion, the Administrator shares the collected personal data of the Client with a chosen entity providing the opinion poll system on commission of the Administrator, within the scope necessary for the Client to express their opinion via the opinion poll system.
 - c. providers of accounting, legal and counselling services that provide accounting, legal or counselling support to the Administrator (in particular accounting office, legal office or debt collection agency) - the Administrator shares the collected personal data of the Client with a chosen provider acting on her commission only in cases and within the scope necessary for the pursuance of a given purpose of data processing, compliant with the present privacy policy.
 - d. Facebook Ireland Ltd. - the Administrator uses on the Website page social plug-ins of the Facebook website (e.g. Like!, Share or log in with the use of Facebook log-in data buttons) and, as a consequence, collects and shares personal data of the Client of the Website page with Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland), within the scope of and in compliance with the privacy regulations available here: <https://www.facebook.com/about/privacy/> (the data in question covers information on activities on the Website page - including information about device, visited sites, purchases, displayed advertisements and way of using services - regardless of the fact whether the Client has a Facebook account or not and whether they are logged in to Facebook).

5) PROFILING ON THE WEBSITE

1. The GDPR Regulation imposes on the Administrator the obligation to inform about automated decision making, including profiling, referred to in Art. 22 paragraphs 1 and 4 of the GDPR Regulation and - at least in those cases - relevant information about decision making rules, as well as about the significance and the anticipated consequences of such processing for data subject. Taking the above into consideration, the Administrator provides in this point of privacy policy information concerning possible profiling.
2. The Administrator can use on the Website profiling for direct marketing purposes, but decisions made by the Administrator on its basis do not concern conclusion of or refusal to conclude an agreement, or the possibility to use Electronic Services on the Website. Using profiling on the Website can result in, for example, granting a discount to a given person, reminding them of unfinished actions on the Website, sending a proposal of service that can be relevant to the given person's interests or preferences, or proposing better conditions in comparison with the standard offer of the Website. In spite of profiling, the given person makes free decision whether they want to use the thus obtained discount or better conditions on the Website.
3. Profiling on the Website consists in automatic analysis or prognosis of a given person's behaviour on the Website, or in analysing the history of previous actions taken by them on the Website. The condition of such profiling is for the Administrator to be in possession of personal data of a given person so that she could sent them e.g. a discount later on.
4. The data subject has the right not to be subject to a decision which is based solely on automated processing, including profiling, and which produces legal effects in relation to that person or has similarly significant effects on them.

6) RIGHTS OF DATA SUBJECT

1. **Right to access, correct, limit, remove or transfer data** - data subject has the right to demand from the Administrator to access their personal data, correct them, remove them ("the right to be forgotten") or to limit their processing, and has the right to raise an objection against their processing as well as the right to transfer their data. Detailed condition of the execution of the above indicated rights are referred to in Art. 15-21 of the GDPR Regulation.
2. **Right to revoke consent at any given time** - the person whose data are processed by the Administrator on the basis of expressed consent (in compliance with Art. 6 paragraph 1 point (a) or Art. 9 paragraph 2 point

(a) of the GDPR Regulation), has the right to revoke their consent at any given moment, which does not affect the legality of the processing done on the basis the consent before its revoking.

3. **Right to file a complaint to a supervisory organ** - the person whose data are processed by the Administrator has the right to file a complaint to a supervisory organ in a way and under procedure specified in the GDPR regulations and in Polish legal regulations, especially in the Law on personal data protection. The supervisory organ in Poland is the President of the Personal Data Protection Office.
4. **Right to object** - data subject has the right to raise an objection at any given moment - due to reasons related to their specific situation - against processing their personal data, in compliance with Art. 6 paragraph 1 point (e) (public interest or services) or (f) (legitimate interest of the administrator), including profiling, in compliance with the aforementioned regulations. In such a case, the Administrator is no longer entitled to process the personal data in question, unless she demonstrates the existence of significant legitimate basis for their processing, overriding the interests, rights and liberties of the data subject, or basis for the establishment, pursuance or defence of claims.
5. **Right to raise an objection in connection with direct marketing** - if personal data are processed for the purposes of direct marketing, data subject can at any given moment raise an objection against processing their personal data for the purposes of such marketing, including profiling, within the scope to which processing is connected with direct marketing.
6. In order to pursue the powers referred to in the present point of the privacy policy, you can contact the Administrator by sending an appropriate message in writing or via electronic mail to the Administrator's address indicated in the introduction to the privacy policy, or by using the contact form available on the Website page.

7) COOKIES ON THE WEBSITE AND ANALYTICS

1. Cookie files (cookies) are small pieces of textual information in the form of text files, sent by the server and saved on the side of the person visiting the Website page (e.g. on the hard drive of computer, laptop, or memory card of smartphone - depending on what device the person visiting our Website uses). Detailed information concerning Cookie files as well as the history of their origin can be found, for instance, here: <http://pl.wikipedia.org/wiki/Ciasteczko>.
2. The Administrator can process data included in Cookie files while visitors use the Website page for the following purposes:
 - a. to identify Clients as logged in to the Website and to show that they are logged in;
 - b. to store data from filled-in forms, surveys or Website logging data;
 - c. to adjust the content of the Website page to the Client's individual preferences (e.g. those connected with colours, font size, page layout) and optimisation of use of the Website pages;
 - d. to remarket, i.e. to study behavioural traits of persons visiting the Website by anonymously analysing their actions (e.g. recurring visits to specific pages, keywords, etc.) in order to create their profile and to provide them with advertisements adjusted to their anticipated interests, also when they visit other web pages within the advertising network of Google Ireland Ltd. and Facebook Ireland Ltd.;
 - e. to keep anonymous statistical records that represent the way they use the Website pages.
3. Normally, most Internet browsers available on the market accept saving Cookie files by default. Everybody has the possibility to specify the conditions of using Cookie files with the use of their own Internet browser settings. It means that you can, for example, partially limit (e.g. temporarily) or completely deactivate the possibility to save Cookie files - in the latter case, however, it can affect some functionalities of the Website.
4. Internet browser settings connected with Cookie files are essential from the point of view of consent to use Cookie files by our Website - in compliance with the regulations, such consent can be expressed also with Internet browser settings. In case such consent is not expressed, you have to change the settings of your Internet browser connected with Cookie files accordingly.
5. Detailed information about changing the settings connected with Cookie files and their unassisted removal in the most popular Internet browsers are available in the help section of a given browser and on the following pages (it is enough to click a given link):
 - [in Chrome browser](#)
 - [in Firefox browser](#)
 - [in Internet Explorer browser](#)
 - [in Opera browser](#)
 - [in Safari browser](#)
 - [in Microsoft Edge browser](#)

6. The Administrator can use on the Website the services of Google Analytics, provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). Those services help the Administrator to analyse Website traffic. The collected data are processed under the aforementioned services to generate statistical records that are helpful in administrating the Website. The above-mentioned data are of collective nature. By using the above-mentioned services on the Website, the Administrator collects such data as the source and medium of sourcing visitors to the Website as well as their behaviour on the Website page, information about devices and browsers they use to visit the page, IP and domain, geographical data and demographic data (age, sex), as well as interests.
7. It is possible for a given person to easily block sharing information about their activity on the Website page with Google Analytics - to that end they can install the browser patch made available by Google Ireland Ltd. that can be downloaded from here: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

8) FINAL PROVISIONS

The Website can contain links to other web pages. The Administrator encourages you to get familiar with the privacy policy established on the web pages you might go forward to. The present privacy policy relates only to the Administrator's Website.