

## **Policy of personal data processing**

in „TERMOINSTAL” Sp. z o.o.

We would like to thank you for visiting our website and being interested in our offer. The protection of your personal data is an important element of the business strategy of „TERMOINSTAL” Sp. z o.o. This Policy of Personal Data Processing is aimed at explaining how we collect your personal data, how we process it, what is the legal basis for such processing and what rights you have. This Policy of Personal Data Processing is an element of our Quality Management System. Protection of personal data protection is an important part of our corporate policy.

Personal data collected in the course of our contacts is kept confidential and processed only in accordance with the provisions of applicable legislation of the Republic of Poland and European Union legislation, as well as in accordance with the rules of the policy of personal data protection adopted by „TERMOINSTAL” Sp. z o.o.

### **Chapter 1 General provisions**

Your personal data (e.g. title, surname, position, address, e-mail address, telephone number) is processed only in accordance with the requirements of the Regulation and other legal acts concerning protection of personal data. The rules presented below are of informative nature and they are supposed to inform about the scope and purpose of collecting, processing and using personal data. In the case, when a user is redirected through the links on our website to other websites, please obtain further information regarding the protection of personal data on such websites.

### **Chapter 2. Personal data controller**

The personal data controller is „TERMOINSTAL” Sp. z o.o. with its registered office in Łańcut, ul. Kardynała Stefana Wyszyńskiego nr 61, postal code 37-100, post in Łańcut, Podkarpackie Province, entered into the Register of Entrepreneurs of the National Court Register under KRS number: 0000165723, kept by the District Court in Rzeszów, XII Commercial Division of the National Court Register, with tax identification number (NIP) – 8150003493, REGON: 690005106.

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

„TERMOINSTAL” Sp. z o.o.

ul. Kardynała Stefana Wyszyńskiego 61

37-100 Łańcut

telephone: +48 17 225-36-01

fax: +48 17 225-34-34

**E-mail:** [biuro@termoinstal-lancut.pl](mailto:biuro@termoinstal-lancut.pl)

In the case of matters related to the processing of personal data, please contact us using the following email address: [rodo@termoinstal-lancut.pl](mailto:rodo@termoinstal-lancut.pl)

### **Chapter 3. Legal basis for the processing of personal data**

The data processing is performed based on the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 “on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (General Data Protection Regulation)”, in particular the legal basis for data processing is the article 6, section 1 (b), article 6, section 1 (c) and article 6, section 1 (f) of the GDPR, or granted consent and provisions of the national law.

### **Chapter 4. Rules and purposes of the personal data processing**

The rules of personal data protection are applicable to all information about an identified or identifiable natural person, e.g. first names, last names, addresses, telephone numbers, e-mail addresses, agreements and billing data, based on which it is possible to determine the identity of a given person.

We process personal data only if we have a legal basis to do so or if you gave consent for such processing, e.g. within registration process.

In particular, the personal data is processed for the following purposes:

- performance of the agreement,
- providing offers,
- implementation of orders,
- providing access to specific offers and information,
- providing information in connection with a legal obligation (e.g. court order or administrative decision),
- direct marketing,
- performance of acquired rights (e.g. enforcement of interest),
- improvement of the quality of products and services,
- opinion poll (note: if we will involve an appropriate market research company, it will process the data only on our behalf and in accordance with our guidelines),

- recruitment,
- determination, pursuit or protection of claims,
- prevention of criminal activity, fraud, offences or other activities inconsistent with the applicable law,
- guarantee of safety of the possessed data (including personal data),
- sending newsletter etc.

### **Chapter 5. Obligation to transfer the personal data**

The personal data may be made available to other recipients for the purpose of implementing the agreement, in order to perform the Controller's legal obligation based on your consent or for the purposes resulting from the legally justified interests of the Controller or a third party. Data may be also transferred to entities that process data at the request of the Controller and their authorized employees, whereas such entities process personal data on the basis of an agreement with the Controller and only in the scope of Controller's order, and provided that the processed personal data will be kept confidential and properly protected in accordance with the appropriate provisions of the law. We may also transfer personal data to third parties that are members of a group of entities affiliated with the Controller in terms of capital and personnel.

Data may be transferred to countries outside the EEA. In such case, we check whether the recipient has an adequate level of personal data protection (e.g. based on a decision of the European Commission or other EU body or country regarding the adequacy of personal data protection system of the given country or agreement with the so-called standard contractual clauses of the European Union with the recipient) or you have to express consent to the transfer of such data, and in each case appropriate level of protection must be ensured and relevant provisions of the law must be applied.

### **Chapter 6. Period of storage of the personal data**

Personal data is processed for the period necessary to achieve the purposes of data processing indicated in Chapter 4, in particular:

- in the scope of implementation of the agreement concluded with us - until the completion of its implementation, and after that time for the period required by provisions of the law or for the pursuit of claims or to protect against claims;
- in the scope of fulfilling our legal obligations resulting from conducted business activity and implementation of concluded agreements - until such obligation is fulfilled;

- in the scope of personal data processing implemented based on the consent - immediately after receiving a written (e-mail) request to delete data, subject to chapter 14;

- until fulfilment of legally justified interests of the Controller that constitute the basis for this processing or until you will object to such processing, unless there is a legally justified basis for further data processing.

### **Chapter 7. Protection of personal data**

Our employees and entities cooperating with us in the scope of Personal Data processing are obliged to maintain confidentiality and strictly comply with the law in the field of personal data protection.

We undertake all necessary organizational, technical and legal measures in order to ensure a proper level of the protection of personal data in our possession, in particular the protection against the risk of unauthorized and unlawful destruction, manipulation, loss, alteration, disclosure or unauthorized access to personal data. Our security measures are continuously improved in connection with the progress of technological information exchange.

### **Chapter 8. Log files**

Every time when you use our website, certain information is automatically transferred through the web browser and stored by us in the so-called log files (e.g. used web browser and operating system; name of the internet domain from which you came; number of visits; average time of your visit; pages which you accessed). This information is not assigned to a specific person.

Log files are stored for a short period of time, in order to identify malfunction and causes associated with the security (e.g. in order to clarify the attack attempts), and then they are removed. Log files that are further required to be stored for evidence purposes are not deleted until the final explanation of the given incident and they may be transferred to investigating authorities in individual cases, in accordance with provisions of the law.

Log files are also used (with or without full IP address) for the purposes of analysis.

### **Chapter 9. Service provider**

We outsource to external service providers such task as: sales, marketing services, management of agreements, payment processing, programming and data hosting. We carefully selected and we regularly monitor these service providers, in particular their careful handling of data stored by them, as well as its protection. We oblige all service providers to maintain confidentiality and comply with legal requirements.

## **Chapter 10. Use of cookies**

Cookies are small text files that are saved on your computer when you visit a website. After re-calling of this online service, the user's web browser sends the content of cookies back to the appropriate provider, therefore allowing to recognize the end device. Reading cookies allows us to optimally design our online offer for you and it facilitates its use, e.g. saving your password. If you don't want the website to recognize your computer, please configure your web browser in a manner that will delete cookies from your hard drive, block all cookies or warn you before saving a cookie.

## **Chapter 11. Analysis of websites**

We need statistical information regarding the method of use of our online offer, in order to make it more user-friendly, as well as to measure range and conduct market research. For this purpose, we use the web analysis tools described in this chapter.

User profiles created by these tools with the use of cookies for analysis or through the analysis of log files, are not connected with personal data. These tools do not use the users' IP addresses at all or they shorten them (anonymize) immediately after completion of examination. Tool suppliers process data only as contractors, in accordance with our instructions, and not for their own purposes.

In the case of tools that support opt-out cookies, it's necessary to remember that the opt-out function is associated with the device or web browser and it applies only to the currently used device or web browser. In the case of using several devices or web browsers, it's necessary to configure the opt-out option for each device and each used web browser.

Moreover, you can also prevent the creation of user profiles by deactivating the use of cookies.

### **12.1 LeadForensic**

We use LeadForensic technologies and services provided by LeadForensic London Communication House 26 York Street London W1U 6PZ for statistical evaluation of websites.

The policy of data processing is compliant with EU requirements in the scope of personal data protection. The detailed rules and contact regarding the request to delete the data may be found on the website of the service provider: <https://www.leadforensics.com/privacy-policy/>

## 12.2 Google Analytics

Google Analytics is a service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses "cookies", i.e. text files placed on the user's computer, in order to enable the website to analyze the way in which the users use it. The information collected by cookies regarding the use of our website (including the user's IP address) is usually sent to a Google's server in the USA and stored there. Please remember that the "gat.\_anonymizeIp();" code has been added to Google Analytics, in order to ensure anonymous collection of IP addresses (the so-called masking of IP addresses). Therefore, the user's IP address is saved by Google only at our request in a shortened form, which guarantees anonymization and it does not allow for any conclusions to be drawn about the user's identity. In the case of activation of IP anonymization on our websites, your IP address will be previously shortened (i.e. it will be processed with the use of a special shortcut function that anonymizes the source IP address) by Google in the EU Member States or in other countries that are parties to the Agreement on the European Economic Area. Only in exceptional cases, your full IP address will be sent to a Google's server in the USA and shortened there. Also, Google complies with the data protection provisions that are contained in the regulations concerning EU-USA privacy protection and it is properly registered on the list at the US Department of Commerce. Google will use this information to assess the use of our website by the user and to compile reports for us regarding the activity on our website, as well as to provide us with further services associated with the use of our websites and the Internet. The IP address sent by the user's web browser in the context of Google Analytics is not combined with other Google data. The transfer of this data by Google to third parties is carried out exclusively on the basis of provisions of the law or as part of the processing of the order data. Under no circumstances, the Google will match the user data to other data collected by Google.

By using this website, you give consent for the processing of your personal data by Google in the manner described above and for the purpose of data processing.

The user may opt out of cookies by selecting the appropriate settings in the web browser, however it's necessary to remember that in such case the use of all functions of our website may not be possible. The user may also prevent Google from collecting data generated by cookies and related to its use of this website (including the IP address), as well as processing of such data by Google, through downloading and installing the browser plug-in.

More information regarding Google Analytics and data protection may be found at the following website: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Moreover, the collection and storage of data by Google Analytics may be cancelled at any time and it may apply in the future by configuring the cookie opt-out files. In order to do this, it's necessary to download the following add-on: <https://tools.google.com/dlpage/gaoptout>. Please remember that if you delete all cookies on your computer, the cookie opt-out will also be deleted, i.e. if you still want to

oppose the anonymous data collection, you must use the provided link again. This setting applies for the web browser and the computer. If you visit our websites at your home and at work or using various web browsers, you must use the above-mentioned tool on each of them. Google also reads cookies from other Google services, such as Gmail, Search and Analytics. All the above-mentioned data is sent to Google in an encrypted form. More information regarding the Google's privacy policy may be found at the following website: <http://www.google.com/policies/privacy/>.

### **Chapter 13. Videos on YouTube**

Our website uses the YouTube video platform provided by YouTube, LLC, 901 Cherry Ave. San Bruno, CA 94066, USA ("YouTube"). YouTube is a platform allowing to play audio and video files.

When you visit the appropriate page of our site, the built-in YouTube player connects with YouTube in order to upload and play a video or audio file. Therefore, the data necessary to play the given contents are transferred to YouTube as the responsible entity. We are not responsible for the processing of this data by YouTube.

In order to obtain more information regarding the scope and purpose of collected data, further processing and use of data by YouTube, your rights and available data protection options, please refer to the information on personal data protection on YouTube.

### **Chapter 14. Rights of the user**

At every stage of our cooperation, you have the right to access the contents of data and to correct it, remove or limit its processing, as well as the right to object, demand the cessation of processing and transferring of data, as well as the right to withdraw your consent at any time and the right to file a complaint to the President of the Office of Personal Data Protection.

You have the right to information regarding the processing of personal data by us. For this purpose, you have the right to access your personal data stored by the Controller. You can request us to correct your personal data and to supplement or delete it. However, this law does not apply to data required in the accounting system or subject to the statutory obligation of data storage. You may also request the limitation of processing of your Personal Data, if there is a legal basis to do so.

At any time, you can object to our processing of your Personal Data. In such situation, we will cease the processing of your Personal Data - unless we have a legal interest in the scope of further processing of data that will prevail over your rights as a user.

This right may be exercised, when one of the following conditions is met:

1. data is no longer necessary to achieve the purpose for which it was collected or for which it is processed;
2. consent to the processing of personal data has been withdrawn and there is no legal basis to proceed with the processing despite that;
3. the Controller received an objection to the processing and there is no overriding legally justified basis for processing, or
4. if the data disclosed by you was processed in a manner that is not compliant with the GDPR or other legal regulations.

If you gave consent to the processing of Personal Data, you may withdraw your consent at any time, which will be effective as of the date of withdrawal. However, this does not affect the legality of processing of your Personal Data before the withdrawal of your consent.

Also, you have the right to receive your Personal Data, which you have provided to us, in a structured, up-to-date and machine-readable format.

In order to exercise the above-mentioned rights, you may contact us by sending an appropriate message in writing or via e-mail to the following e-mail address: [rodo@termoinstal-lancut.pl](mailto:rodo@termoinstal-lancut.pl).