

Privacy policy

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Preliminary information

Respecting your right to privacy, the personal data controller: COMP Spółka Akcyjna seated in Warszawa, ul. Jutrzenki 116, 02-230 Warszawa, KRS no 0000037706, processes personal data in accordance with national and European provisions on the protection of personal data, in particular with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on protection of individuals 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: "GDPR").

The controller has completed a comprehensive GDPR implementation project and performs and maintains up-to-date analyzes of compliance with the law on the protection of personal data, including by performing a risk analysis and applying security measures for the processing of personal data, corresponding to the risk of violation of the rights and freedoms of natural persons.

In case of any doubts related to the processing of your data, please contact the data protection officer, Anna Pietkiewicz, at iod@comp.com.pl

If, as part of certain purposes of processing, our organization is the controller jointly with other entities, the information in this respect will be provided separately, including under the terms of use of the Facebook social networking site on which the controller maintains a profile, available at: https://www.facebook.com/legal/terms/page_controller_addendum

There are also situations where our organization is the data processor, and the controller is the entity on behalf of which we process data. In the event of such a situation, you will receive information about the processing from this controller.

Purposes, legal basis and data retention periods by COMP

1. Potential customers of COMP, including addressees of marketing activities

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the data subject - the source and categories of data |
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| Implementation of the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in the marketing of own products and services, and in the case of express consent - also products and services of companies cooperating with the Controller (Article 6(1)(a) of the GDPR), using the following forms of communication: sending commercial | Until the consent is withdrawn or an objection is raised. After withdrawing consent or expressing an objection, personal data may be stored for the purpose of demonstrating the correctness of compliance with legal obligations incumbent on the Controller and, if justified - investigating, establishing or defending claims. | If we have not obtained personal data directly from the data subject, then their source is the entity that had the consent to make them available to the Controller, or another valid legal basis. In this case, the personal data obtained includes data necessary to conduct a given type of marketing activities (typically, these are name, surname, e-mail address, |

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| information (e-mail), sending commercial information (sending text messages), voice calls (telephone marketing), sending promotional materials by traditional mail. | | telephone number and/or correspondence address). |
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2. COMP's clients and persons appointed to perform the contract

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the data subject - the source and categories of data |
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| <p>Performance of the contract with the Customer or taking action before concluding the contract, at the Customer's request, expressed in any way, e.g. by completing the contact form on the website.</p> <p>Accounting, bookkeeping and financial reporting.</p> <p>Fulfillment of obligations arising from legal provisions.</p> <p>Purposes indicated in the content of the consents, if expressed.</p> <p>And also in connection with the implementation of the Controller's legitimate interests:</p> <ul style="list-style-type: none"> - in order to establish, pursue and defend claims, - for statistical purposes related to improving work efficiency, quality of services provided and adapting them to recipients. <p>Legal basis: performance of the contract with the Customer (Article 6(1)(b) of the GDPR - if you are a Customer; Article 6(1)(f) of the GDPR - if you are a</p> | <p>For the duration of the contract, in particular the mojakasa.online terms and conditions or other contract for the provision of electronic services, and in the case of data processing only on the basis of consent - until its withdrawal.</p> <p>After deleting the user account, your personal data will be deleted, except for the data necessary to handle complaints and to pursue and defend against claims, which will be stored until their final solution or until the claims expire, whichever is longer.</p> | <p>Personal data has been obtained from you, from the Client or from a person cooperating with us on behalf of the Client. We obtain personal data to the extent necessary to conclude and perform the contract, most often these are: name, surname, postal address, e-mail address, telephone number, order data and invoice data. In the case of electronic transaction handling - also login, password and activity history.</p> |

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| <p>person cooperating with us on behalf of the Customer); performance of legal obligations (Article 6(1)(c) of the GDPR), legitimate interests of the Controller (Article 6(1)(f) of the GDPR); Optional data from the perspective of the above legal basis are processed on the basis of consent, if such has been granted (Article 6(1)(a) or Article 9(2)(a) of the GDPR).</p> | | |
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3. Contractors, suppliers and persons appointed to perform the contract

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the data subject - the source and categories of data |
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| <p>Performance of the contract with the Counterparty or taking action before concluding the contract, at the request of the Counterparty (Article 6(1)(b) of the GDPR - if you are a Counterparty; Article 6(1)(f) of the GDPR - if you are a person acting on behalf of or for counterparty), in order to conduct settlements, accounting and financial reporting (Article 6(1)(c, f) of the GDPR),</p> <p>Implementation of other obligations resulting from legal provisions (Article 6(1)(c) of the GDPR).</p> <p>Implementation of other legitimate interests of the Controller (Article 6(1)(f) of the GDPR):</p> | <p>Personal data will be stored for the period required by law or, if justified, until the expiry of the limitation periods for claims under the contract with the Counterparty - depending on which period is longer.</p> | <p>In principle, we process the data provided by you. If you did not provide us with your data, we obtained it from our Contractor or from a person acting on behalf of or for our Contractor. We obtain personal data to the extent necessary to conclude and perform the contract, most often these are: name, surname, postal address, e-mail address, telephone number, order data and invoice data. If the contract is concluded in writing, we also process the PESEL number or ID card number. In the case of cooperation in the IT system - also login, password and history of cooperation.</p> |

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| <p>If it is justified - determination, investigation and defense of claims.</p> <p>Statistical purposes related to improving work efficiency, quality of services provided and adapting them to recipients.</p> | | |
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4. Persons appearing on promotional materials and providing references to COMP

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the data subject - the source and categories of data |
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| <p>Promotion of the Controller, and in the case of a valid legal basis (e.g. additional permission), also of organizations cooperating with him (Article 6(1)(f) of the GDPR), in order to implement the provisions of the contract between you and the Controller, if one has been concluded (Article 6(1)(b) of the GDPR).</p> <p>If applicable - keeping settlements, accounting and financial reporting (Article 6(1)(c, f) of the GDPR),</p> <p>Fulfillment of other obligations resulting from legal provisions (Article 6(1)(c) of the GDPR), for the purposes indicated in the content of consents to the processing of personal data - if such consents were expressed (Article 6(1)(a) of the GDPR).</p> <p>Implementation of other legitimate interests of the</p> | <p>Personal data will be stored for the period of validity of the legal basis for disseminating the image, and in the case of concluding a contract - until its implementation, and if justified, until the claims arising from it expire.</p> | <p>In principle, we process the data provided by you. If you did not provide us with your data, then their source is the author of the given material or the entity holding the rights to it. Typically, personal image data is collected.</p> |

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| <p>Controller (Article 6(1)(f) of the GDPR): in order to conduct marketing and promotion of the event by the Controller,</p> <p>Execution of the Controller's copyright rights (including permission to disseminate the image and dissemination of the image of public figures or persons constituting only a detail of the whole), in order to establish, pursue and defend claims.</p> | | |
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5. Participants in promotional campaigns, including competitions and events

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the data subject - the source and categories of data |
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| <p>Fulfilling the obligations of the organizer of a competition or promotional campaign, including handling applications, informing about the results and selecting winners as well as awarding and sending competition prizes, which is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR).</p> <p>Keeping settlements, accounting and financial reporting (Article 6(1)(c, f) of the GDPR).</p> <p>Implementation of other obligations arising from legal provisions (Article 6(1)(c) of the GDPR).</p> <p>Implementation of the objectives indicated in the</p> | <p>Personal data will be stored for the period necessary to fulfill the purpose for which they were collected, i.e. the implementation and organization of a competition or promotional campaign, and if it is justified - for the period of limitation of claims.</p> | <p>In principle, we obtain personal data from you.</p> |

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| <p>content of consents to the processing of personal data - if such consents were expressed (Article 6(1)(a) of the GDPR).</p> <p>Implementation of other legitimate interests of the Controller (Article 6(1)(f) of the GDPR):</p> <ul style="list-style-type: none"> - if it is justified - in order to establish, pursue and defend claims, - for statistical purposes related to improving work efficiency, quality of services provided and adapting them to recipients. | | |
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6. Users of social media and COMP websites

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the data subject - the source and categories of data |
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| <p>In order to run COMP websites and COMP accounts on social networking sites, including promoting the brand, moderating the forum, accepting applications, fulfilling legal obligations, establishing claims and keeping statistics, which is the Controller's legitimate interest (Article 6(1)(f) GDPR).</p> | <p>Your personal data will be stored until you withdraw your consent or raise an objection, i.e. you show us in any way that you do not wish to stay in touch with us and receive information about our activities. After withdrawing consent or expressing an objection, personal data may be stored for the purpose of demonstrating the correctness of compliance with legal obligations incumbent on the Controller or, if justified, until the expiration of the limitation periods for claims, whichever is longer. The deadlines for processing cookies are indicated in a separate chapter of this policy.</p> | <p>In principle, we process the data provided by you. If you have not provided us with your data, their source is the person who provided your data in the application. We obtain personal data to the extent necessary to handle the notification, most often it is name and surname, e-mail address, telephone number, correspondence address, circumstances subject to notification, bank account number.</p> |

7. Applicants, submitting complaints, inquiries and their representatives

| Purposes and legal basis for data processing | Data retention periods | In the event of obtaining data from a source other than the |
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| | | data subject - the source and categories of data |
|---|---|--|
| <p>Consideration of a complaint, application or complaint (Article 6(1)(f) of the GDPR).</p> <p>Performance of the contract related to the application (Article 6(1)(b) of the GDPR - if you are a party to the contract; Art. 6(1)(f) of the GDPR - if you are a person cooperating with us on behalf of our client or contractor).</p> <p>If applicable - for the purposes of billing, accounting and financial reporting (Article 6(1)(c) of the GDPR).</p> <p>Fulfillment of other obligations resulting from legal provisions (Article 6(1)(c) of the GDPR), for the purposes specified in the content of the consent, if any (Article 6(1)(a) of the GDPR).</p> <p>And also in connection with the implementation of the Controller's legitimate interests (Article 6(1)(f) of the GDPR):</p> <ul style="list-style-type: none"> - in order to establish, pursue and defend claims, - for statistical purposes related to improving work efficiency, quality of services provided and adapting them to recipients. <p>NOTE: if the description of the circumstances of the event contains data of a special category, they will be processed in order to establish, pursue and defend claims (Article 9(2)(f) of the GDPR), and otherwise, on the basis of consent, which is your explicit action : making them available</p> | <p>Your personal data will be stored until the final consideration of the application, and in the event of processing for the purpose of establishing, pursuing or defending claims - until the statute of limitations expires and the proceedings, including enforcement proceedings, are expired.</p> | <p>In principle, we process the data provided by you. If you have not provided us with your data, their source is the person who provided your data in the application. We obtain personal data to the extent necessary to handle the notification, most often it is name and surname, e-mail address, telephone number, correspondence address, circumstances subject to notification, bank account number.</p> |

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| on your initiative in order to consider the application (Article 9(2)(a) of the GDPR). | | |
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Data recipients

Your personal data may be made available to recipients of personal data, such as:

- Companies providing services or providing IT solutions, including ICT infrastructure.
- Entities cooperating with the Controller, which will be authorized to process personal data on the basis of a written data processing agreement, as well as authorized employees and associates of the Controller.
- Subcontractors, suppliers and partners of COMP.
- Companies providing courier and postal services.
- Law firms or legal advisers' offices.
- Companies providing consulting and auditing services.
- Companies conducting marketing activities.
- Document archiving and shredding companies.
- Banks, insurance companies and other financial and payment institutions.
- Sales platforms and payment operators.
- Public authorities receiving data in connection with the implementation of the Controller's legal obligations.
- Entities from the capital group to which the Controller belongs.

Rights of the data subject

In situations provided for by law, you have the right to: access data and receive a copy thereof, rectify (change) data, delete personal data, limit data processing, transfer data - if the legal basis for their processing is consent (Article 6(1)(a) or Article 9(2)(b) of the GDPR) or a contract (Article 6(1)(b) of the GDPR), the right to withdraw consent to data processing when it is the basis for data processing (Article 6(1)(b) of the GDPR) or a contract (Article 6(1)(b) of the GDPR), the right to object to the processing of personal data - if the legal basis for processing is a legitimate interest (Article 6(1)(f) of the GDPR).

If it is recognized that the processing of personal data by the Controller violates the provisions of the GDPR, you have the right to lodge a complaint with the supervisory body - the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw).

More information about the rights of data subjects is available in art. 12-23 GDPR, the text of which can be found at [this](#) address.

Automated decision making

In principle, the Controller does not process personal data in order to make automated decisions that may have legal effects or a similarly significant impact. If such effects are possible, the Controller will first provide the appropriate legal basis and provide the required information in a clear and separate manner.

Data transfer outside the European Economic Area

In principle, personal data will not be transferred outside the European Economic Area (hereinafter: EEA). However, bearing in mind the services provided by the Controller's subcontractors in the implementation of support for ICT services and IT infrastructure, the Controller may outsource certain activities or IT tasks to recognized subcontractors operating outside the EEA, which may result in the transfer of your data outside the EEA.

Countries of recipients outside the EEA, in accordance with the decision of the European Commission, ensure an adequate level of protection of personal data in accordance with EEA standards. In the case of recipients in the territory of countries not covered by the European Commission's decision, in order to ensure an adequate level of this protection, the Controller concludes agreements with the recipients of your personal data, based on standard contractual clauses issued by the European Commission in accordance with art. 46 sec. 2 lit. c GDPR.

A copy of the Standard Contractual Clauses may be obtained from the Controller by contacting the contact details provided above. The method of securing your data used by the Controller complies with the principles provided for in Chapter V of the GDPR. You can request further information about the security measures applied in this regard, obtain a copy of these security measures and information about where they are made available.

Voluntary provision of data

Providing personal data as part of the processing purposes indicated in this privacy policy is a condition for concluding a contract necessary for its implementation, as well as the settlement of business activity and the Controller's compliance with legal requirements. In the remaining scope (in particular for the purpose of data processing by the Controller for marketing purposes), providing data is voluntary.

Data processing on COMP websites

Cookies

COMP websites automatically process information contained in *cookie files*. COMP informs that cookies (so-called "cookies") are IT data, in particular text files, which are stored in the end device of the website user. Cookies usually contain the name of the website they come from, their storage time on the end device and a unique number.

Cookies are used to :

- adapting the content of the Website pages to the user's preferences and optimizing the use of websites; in particular, these files allow to recognize the website user's device and properly display the website, tailored to his individual needs;
- creating statistics that help to understand how Website Users use websites, which allows improving their structure and content;
- maintaining the website user's session;

cookies are used on the Website :

- "necessary" cookies , enabling the use of services available on the Website, e.g. authentication cookies *used* for services requiring authentication on the Website; cookies used to ensure security, e.g. used to detect abuses in *the* field of authentication within the Website.
- "performance" or "statistical" cookies , enabling the collection of information on how the Website's pages are used.
- "marketing" cookies , enabling the provision of advertising content to Users more tailored to their interests.

Below we indicate the details of cookie processing on COMP websites:

| Name | Purpose of processing | Processing period | Recipient |
|-------------------------|--|-------------------|------------------------|
| algoliasearch-client-js | Necessary for optimization, including ensuring the accuracy and efficiency of the search function within the website | Indefinite | not applicable |
| hex (32) | Necessary to manage server calls to the site's back-end systems | Session | not applicable |
| test_cookie | Necessary to verify whether the user's browser uses cookies | 1 Day | Google Ireland Limited |
| dc_gtm_UA -# | Statistical purposes. Used by Google Tag Manager to control the loading of the Google Analytics script tag | 1 Day | Google Ireland Limited |
| _GRECAPTCHA | Essential to distinguish humans from robots. It is beneficial for the website to make correct reports on the use of their website. | 179 days | Google Ireland Limited |
| rc ::a | Essential to distinguish humans from robots. It | Constant | Google Ireland Limited |

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| | is beneficial for the website to make correct reports on the use of their website. | | |
| rc ::b | Essential to distinguish humans from robots. | Session | Google Ireland Limited |
| rc ::c | Essential to distinguish humans from robots. | Session | Google Ireland Limited |
| _ga | Statistical purposes. Registers a unique identifier that is used to generate statistical data about how the visitor uses the site | 2 years | Google Ireland Limited |
| _gid | Statistical purposes. Registers a unique identifier that is used to generate statistical data about how the visitor uses the site | 1 Day | Google Ireland Limited |
| collect | Statistical purposes. Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels | Session | Google Ireland Limited |
| _fbp | Marketing. Used by Facebook to deliver a series of advertising products such as real-time third party bidding advertisers | 3 months | Meta Platforms Ireland Ltd |
| _gcl_au | Marketing. Used by Google AdSense to experiment with ad performance on sites that use them services. | 3 months | Google Ireland Limited |
| ads / ga-audiences | Marketing. Used by Google Ads to re-engage users who are likely to turn into | Session | Google Ireland Limited |

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| | customers based on the user online behavior on different websites | | |
| c | Marketing. Used to check if the user's browser supports cookies | 1 month | Google Ireland Limited |
| fri | Marketing. Used by Facebook to deliver a series of advertising products such as real-time third party bidding advertisers | 3 months | Meta Platforms Ireland Ltd |
| IDE | Marketing. Used by Google DoubleClick to register and report the website user's actions after being viewed or clicked one of the advertiser's advertisements in order to measure the effectiveness of the advertisement and present the user with a targeted advertisement | 1 year | Google Ireland Limited |
| pagead /1p-user-list/# | Marketing. Tracks whether a user shows interest in certain products or events across multiple websites and detects how the user moves between sites. This is used to measure ad spend and facilitates referral commission payment between websites | Session | Google Ireland Limited |
| uid | Marketing. Registers a unique user ID that recognizes the user's browser when visiting websites that use the same advertisement | 2 months | Google Ireland Limited |

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| | network. The purpose is to optimize the display of advertisements based on the user's movements and the offers of various advertising providers for displaying to the user ads | | |
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Web browsers (website user software) allow cookies to be stored on the end device by default . The site user can always change the web browser settings that determine the use of *cookies* . Restrictions on the use of *cookies* may affect the functionality of the Website. Cookies placed on the Website user's end device may also be used by advertisers and partners cooperating with the website operator . The website operator informs that the entity responsible for placing cookies *on* the end device of the website user who also has access to them is the Controller. The controller informs that information on how to handle cookies *is* available in the software (web browser) settings. More information about cookies *is* available in the "help" section of the web browser menu. Each user who does not agree to the use of cookies *is* obliged to modify the settings of the web browser. **Browser configuration enabling the use of cookies means consent to the Controller storing the information referred to above** , in accordance with art. 173 sec. 2 of the Act of July 16, 2004 Telecommunications Law (Journal of Laws of 2017, item 1907, as amended) . Instructions for changing the settings are available at:

- [Chrome](#)
- [Firefox](#)
- [Opera](#)
- [Safari](#)

Server logs

Using the Website involves sending queries to the server where the Website is stored. Each query addressed to the server is saved in the server logs. Logs include e.g. User's IP address, server date and time, information about the web browser and operating system used by the User.

Logs are saved and stored on the server. The data stored in the server logs are not associated with specific persons using the Website and are not used by the Controller to identify the User.

Server logs are only auxiliary material used to administer the Website, and their content, In principle, is not disclosed to anyone except persons authorized to administer the server.

Google Analytics

The websites use Google Analytics, a web analytics service provided by Google Ireland Limited (hereinafter: Google). Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymization on these pages, your IP address will be shortened beforehand by Google within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services relating to website activity and internet usage to the website operator. The IP address provided by Google Analytics will not be combined with other data held by Google.

The purpose of data processing is to evaluate the use of the website and to compile reports on website activities. Based on the use of the website and the Internet, other related services will be provided. The processing is based on the legitimate interest of the Controller.

Google Analytics collects data on IP addresses, network location, date of visit, operating system, browser type. You can prevent the storage of cookies by setting your browser software accordingly; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible. In addition, you can prevent Google from collecting data generated by cookies and data related to the use of the website (including your IP address), and the processing of this data by Google by downloading and installing the browser plug-in Add On to disable Google Analytics by clicking [this link](#)

Facebook

Based on our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 (1) (f) GDPR, we use social plug-ins ("plugins") of the social network facebook.com, operated by Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). Plugins may represent elements of interaction or content (e.g. videos, graphics or text inserts) and may be recognized by one of the Facebook logos (a white "f" on a blue tile, the terms "Like", "Like" or "Thumbs Up" " mark") or are marked with the addition "Facebook Social Plugin". You can check the list and appearance of Facebook social plug-ins [here](#).

When you use functions on a website that contains such a plug-in, your device establishes a direct connection to the Facebook servers. The content of the plug-in is transmitted by Facebook directly to the user's device and integrated by him into the online offer. In this process, user profiles can be created from the processed data. We have no influence on the amount of data collected by Facebook using the plug-in, hence we inform users about how they operate according to our knowledge.

We use a "User Action Pixel" called "Facebook Pixel", a service provided by Facebook on our website. With its help, we can track the actions of users after viewing or clicking on a Facebook ad. This allows us to track the effectiveness of Facebook ads, which we use for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the personal data of individual users. However, this data is stored and processed by Facebook, which we inform you to the best of our knowledge.

Facebook may link this data to its Facebook account as well as use it for its own advertising purposes, in accordance with [Facebook's data use policy](#). You can prevent Facebook and its affiliates from displaying ads on and off Facebook.

By integrating the plugins, Facebook receives the information that the user has accessed the corresponding page. If the user is logged in to Facebook, Facebook can assign the visit to his Facebook account. If users interact with the plug-ins, for example by using the Like button or the comment function, information is sent from the device directly to Facebook and stored there. If the user is not a member of Facebook, there is still the possibility that Facebook will obtain an IP address.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as the related rights and setting options for protecting the privacy of users, can be found [in the Facebook privacy policy](#). If you are a member of Facebook and do not want Facebook to collect data about you via this website and associate it with your data stored on Facebook, you must log out of Facebook and delete your cookies before using our website. Other setting changes regarding the use of data for advertising purposes are possible in the Facebook [profile settings](#).