

## Privacy Policy for the website: <https://www.biurfol.pl/>

Below we present detailed information regarding the processing of your personal data:

### DEFINITIONS AND ABBREVIATIONS USED IN THE POLICY

1. **Administrator** – The Administrator of personal data is BIURFOL Sp. z o. o., with its registered office in Toruń, at ul. Chrobrego 149, 87-100 Toruń, VATIN: 8792584095.
2. **Personal data** – Any information regarding an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
3. **Policy** – This privacy policy.
4. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
5. **Service** – The online service operated by the Administrator at: <https://www.biurfol.pl/>.
6. **User** – A user is understood as any natural person visiting the Administrator's Service or using one or more services described in this privacy policy. A user is also understood as any natural person communicating with the Administrator via email or the contact form available on the Service.

### HOW CAN YOU CONTACT US REGARDING THE PROCESSING OF PERSONAL DATA?

You can contact the administrator regarding your personal data via email at: [marketing@biurfol.pl](mailto:marketing@biurfol.pl) or by mail to the correspondence address: ul. Chrobrego 149, 87-100 Toruń.

### FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS IS PERSONAL DATA PROCESSED?

#### 1. In the scope of using the Service

During your visit to the administrator's website, the servers automatically store system logs – anonymous information such as the user's IP address or the duration of the session on the website. This information is used to improve the quality of our service and analyze website visit statistics. It may also be used for security purposes in the event of incidents that need to be clarified. All information contained in the web server log files is stored for a limited time and deleted thereafter. The information is not disclosed to anyone other than those authorized to administer the server. This data is not associated with specific individuals browsing the administrator's website.

Data of users utilizing the service (including the IP address or other identifiers) will be processed for the following purposes:

- To provide electronic services by making the content collected on the service available to users – in this case, the legal basis for processing is the necessity to process the data for the performance of a contract (Article 6(1)(b) GDPR);
- And for the purpose of establishing and pursuing claims or defending against claims – the legal basis for processing is the legitimate interest of the administrator (Article 6(1)(f) GDPR), which involves the protection of their rights.

## **2. In the scope of conducting electronic correspondence**

If you contact the administrator via email or through the contact form available on the Service, personal data included in the correspondence will be processed to enable email communication with the administrator and to maintain contact with the recipients, as well as to document arrangements made with clients, contractors, and other individuals. The legal basis for data processing is the legitimate interest of the administrator, which involves handling correspondence directed to them in connection with their business activities (Article 6(1)(f) GDPR).

The administrator also declares that only personal data relevant to the matter addressed in the correspondence will be processed. All correspondence is stored in a manner that ensures the security of the personal data contained therein.

Providing the data necessary for conducting electronic correspondence is voluntary; however, without it, the administrator will not be able to handle the correspondence related to the subject matter you are addressing.

## **3. In the scope of conducting a newsletter**

On our Service, it is possible to sign up for a newsletter by providing an email address. The provided email address will be used solely for sending the information bulletin. If you do not provide your contact information, the Administrator will not be able to send the newsletter. The legal basis for processing personal data for this purpose is the consent given by the User (Article 6(1)(a) GDPR).

### **Withdrawal of consent to the newsletter**

The User can unsubscribe from the newsletter at any time by clicking the appropriate link included at the end of each message or by sending an email to: [marketing@biurfol.pl](mailto:marketing@biurfol.pl).

## **WHAT ARE YOUR RIGHTS REGARDING PERSONAL DATA PROCESSING?**

You have the right to:

- Request access to your data, as well as receive a copy of it;
- Request rectification (correction) of your data, as well as the completion of incomplete personal data;
- Request the deletion of your data;
- Request the restriction of processing – for example, if you notice that the data is incorrect, you may request the restriction of the processing of your data for a period allowing us to verify the accuracy of the data;

- Request the transfer of your personal data;
- Object to the processing of your data if the processing is based on the legitimate interest of the administrator;
- Lodge a complaint with the President of the Personal Data Protection Office if you believe that the processing of your personal data has violated the law;
- Withdraw your consent at any time without any consequences for the processing carried out prior to the withdrawal, if the data is collected based on consent.

A request to exercise your rights can be submitted by writing to the email address: [marketing@biurfol.pl](mailto:marketing@biurfol.pl). The request should include data that allows for unequivocal identification.

The scope of each of these rights and the circumstances in which they may be exercised are determined by the law. Which right you can exercise will depend, for example, on the legal basis for the Administrator's use of your personal data.

## **HOW LONG DO WE PROCESS PERSONAL DATA?**

The period for processing personal data is determined based on the purpose of the processing and the existing legal basis:

- Personal data processed due to the necessity of performing a contract is processed for as long as it is necessary to perform the contract, and after that for a period corresponding to the statute of limitations for claims;
- If we process your data based on your consent, the data is processed until the consent is withdrawn or until the purpose of the processing ceases;
- If personal data is processed based on a legitimate interest, the processing period lasts until the legitimate interest ceases or until you submit an effective objection.

## **TO WHOM DO WE DISCLOSE PERSONAL DATA?**

Your personal data may be disclosed to:

- Authorities or entities authorized under separate regulations;
- Entities providing technical and administrative support to the administrator's activities, such as software providers, email service providers, and hosting providers.

## **WILL WE TRANSFER PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?**

The administrator generally does not transfer personal data outside the EEA. However, it may happen that your personal data is transferred in a limited scope outside the European Economic Area to Microsoft, as part of using the Office 365 suite. To protect your personal data, Microsoft uses various security measures, including data encryption and pseudonymization, which replaces identifying data with other data, making it impossible to identify you. This ensures the protection of your privacy. Additionally, Microsoft participates in the Data Privacy Framework program, which means it meets specific standards and data protection measures that have been approved by the European Commission. This provides additional security for the data during its transfer outside the EEA.

## INFORMATION ABOUT COOKIES

The Service uses both internal and external cookies for the following purposes:

### Necessary cookies:

- To ensure its proper functioning.

### Optional cookies:

- To facilitate convenient usage, including remembering User preferences (functional/preference cookies);
- To monitor website traffic, analyze user behavior, evaluate the effectiveness of the website for business purposes, optimize the website, and prepare reports and analyses (analytical/statistical cookies), using tools such as Google Analytics. The information obtained through cookies relates to how users use our website and does not enable the identification of individuals, as IP addresses are anonymously recorded;
- To promote our website on social media platforms like Facebook (Meta);
- To advertise our website on the Internet (marketing cookies) using tools provided by Google, Meta, including Google Ads, Google Tag, and Meta Ads. For more information, you can refer to the Google Privacy Policy and the [Meta Data Policy](#). If you wish to opt out of Google cookies, click on the link to Google's Ads Settings;
- To personalize content and ads to offer social media features and analyze traffic on our website. We share information about how you use our site with social media, advertising, and analytics partners (Google, Meta). These partners may combine the information with other data received from you or collected during your use of their services.
- The use of this category of cookies is based on your consent.

You can withdraw your consent at any time and stop the installation and collection of data via cookies. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

The User can manage consent for storing optional cookies on their device by appropriately configuring the web browser. Detailed information on this can be found by using the Help function in the browser or by visiting the website <http://www.allaboutcookies.org>, which provides step-by-step instructions on how to control and delete cookies in most browsers.

Consent is not required only for cookies that are necessary for providing telecommunication services (data transmission to display content).

To secure the contact forms on the website from attacks that involve mass-filling and submitting forms by bots, we use the reCAPTCHA solution.

### Personal Data vs. Cookies

Information obtained through the cookie mechanism and operational data may constitute personal data under GDPR in certain exceptional situations. If the above-mentioned information is classified as personal data, BIURFOL is the administrator of such data. Even in cases of doubt about whether a specific category of information constitutes personal data, the Administrator implements mechanisms to protect this information as personal data.

In the situation described above, we will process information about individuals visiting the Service, collected through cookies and other similar technologies, to ensure the proper functioning of the website's features, based on the Administrator's legitimate interest (Article 6(1)(f) GDPR).

However, if consent is given for the installation of "optional" cookies (analytical/statistical cookies, e.g., provided by Google Analytics, or marketing cookies, e.g., provided by Google Ads), the information collected in this way will be used to study the preferences of those using our service and to prepare appropriate marketing actions. In this case, the legal basis for data processing is Article 173(2) of the Telecommunications Law (Journal of Laws of 2004 No. 171, item 1800) in conjunction with Article 6(1)(a) GDPR.

#### **CHANGES TO THE PRIVACY POLICY**

The privacy policy is continuously reviewed and updated as necessary.

The current version of the policy is effective from September 23, 2024.