

**MARUTA \**

**WEBSITE PRIVACY POLICY**

## PRIVACY POLICY

### 1. DEFINITIONS

- 1.1. **Controller** – TKT Engineering Sp. z o.o. with registered office in Warsaw, ul. Pryzmaty 4, 02-226 Warszawa.
- 1.2. **Personal data** – all information about an identified natural person or natural person identifiable through one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, location data, online ID and information collected through cookies or other similar technology.
- 1.3. **Policy** – this Privacy Policy.
- 1.4. **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.
- 1.5. **Website** – a website operated by the Controller under the following link: <https://www.tkt.pl/>.
- 1.6. **User** – any natural person visiting the Website or using one or more services or functionalities described in the Policy.

### 2. PROCESSING OF DATA IN CONNECTION WITH THE USE OF THE WEBSITE

- 2.1. In connection with the use of the Website by the User, the Controller collects data to the extent necessary for providing individual services offered, as well as information about the User's activity on the Website. Below are described specific rules and purposes of the processing of personal data collected during the User's activity on the Website.

### 3. PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF DATA ON THE WEBSITE

- 3.1. Personal data of all persons using the Website (including IP address or other identifiers and information collected through cookies or other similar technology) and who are not registered Users (i.e. persons without a profile on the Website) is processed by the Controller.
  - 3.1.1. in order to provide services electronically to the extent of making contents collected on the Website available to the Users – then the legal basis for the processing is the necessity of processing to implement the contract (art. 6 sec. 1 letter b) of the GDPR);
  - 3.1.2. for analytical or statistical purposes – then the legal basis for the processing is the legitimate interest of the Controller (art. 6 sec. 1 letter f) of the GDPR) consisting of analysing the activity of the Users;
  - 3.1.3. for possibly establish and assert claims or defend against such claims – the legal basis for the processing is the legitimate interest of the Controller (art. 6 sec. 1 letter f) of the GDPR) consisting of protecting their rights.

- 3.2. User activity on the Website, including their personal data, is recorded in system logs (a special computer programme designed for storing a chronological record containing information on events and actions concerning the IT system used for the Controller to render services). Information collected in the logs is processed mainly for the purpose related to the provision of services. The Controller processes it also for technical and administrative purposes, to ensure security of the IT system and manage it, and for analytical and statistical purposes – in this scope the legal basis for the processing is the legitimate interest of the Controller (art. 6 sec. 1 letter f) of the GDPR).

#### 4. COOKIES AND SIMILAR TECHNOLOGY

- 4.1. Cookies are small text files installed on the device of the User browsing the Website. Cookies collect information facilitating the use of a website – e.g. by remembering visits of the User to the Website and actions carried out by the same.

##### 'WEBSITE' COOKIES

- 9.2. The Controller uses so-called website cookies mainly to provide the User with services rendered electronically and to improve the quality of such services. Therefore, the Controller and other entities providing analytical and statistical services to the Controller use cookies to store information or access information already stored on User's telecommunications terminal equipment (computer, smartphone, tablet, etc.). Cookie used for this purpose include:

- 4.2.1. user input cookies (session identifier) for the duration of the session;
- 4.2.2. authentication cookies for services requiring authentication for the duration of the session;
- 4.2.3. user centric security cookies, e.g. used for detecting authentication abuse;
- 4.2.4. multimedia player session cookies (e.g. flash player cookies) for the duration of the session;
- 4.2.5. persistent user interface customisation cookies for the duration of the session or a bit longer;
- 4.2.6. cookies used to monitor website traffic, i.e. data analytics, including Google Analytics cookies (these are files used by Google to analyse the way the Website is used by the Users, create statistics and draw up reports on the functioning of the Website). Google neither use collected data to identify the User nor combine this information for the purpose of such identification. Specific information on the scope and purposes of collecting data in connection with that service can be found under the following link: <https://www.google.com/intl/pl/policies/privacy/partners>.

#### 5. PERSONAL DATA PROCESSING PERIOD

- 5.1. The period of data processing by the Controller depends on the type of a service provided and the purpose of the processing. As a rule, data is processed for the time of rendering the service or fulfilling the order, until consent is withdrawn or an effective objection is made to

the data processing in the event the legal basis for the processing is the legitimate interest of the Controller.

- 5.2. The data processing period may be extended in the event the processing is necessary to establish or assert claims or to defend against such claims, and after that period – only if and to the extent required by law. After the expiry of the processing period, data is irreversibly erased or anonymised.

### 6. USER'S RIGHTS

- 6.1. The User has the right to access the content of data and demand its rectification, erasure, restriction of processing, the right of data portability and the right to object to the processing of data, and the right to lodge a complaint with a supervisory body responsible for personal data protection.
- 6.2. Insofar as the User's data is processed on the basis of consent, it can be withdrawn at any time by contacting the Controller at the email address [kodo@tkt.pl](mailto:kodo@tkt.pl).
- 6.3. The User has the right to object to the processing of data for marketing purposes, if the processing is carried out in connection with the legitimate interest of the Controller and also – for reasons related to a specific situation of the Controller – in other cases when the legal basis for the processing of data is the legitimate interest of the Controller (e.g. in connection with the fulfilment of analytical and statistical purposes).
- 6.4. More information on the rights under the GDPR can be found under [this link: https://www.tkt.pl/userfiles/180520\\_Polityka%20przetwarzania%danych%20osobowych\\_1\\_2\\_TKT%20Engineering%20Sp\\_%20z%20o\\_o\\_kch\\_clean.pdf](https://www.tkt.pl/userfiles/180520_Polityka%20przetwarzania%danych%20osobowych_1_2_TKT%20Engineering%20Sp_%20z%20o_o_kch_clean.pdf).

### 7. DATA RECIPIENTS

- 7.1. In connection with the provision of services, personal data is disclosed to third parties, including in particular to suppliers responsible for operating IT systems, entities providing accounting services, couriers (for order fulfilment), marketing agencies (for marketing services).
- 7.2. The Controller reserves their right to disclose selected information concerning the data subject to relevant bodies or third parties applying for the provision of such information on the basis of an appropriate legal basis and in accordance with the applicable law.

### 8. TRANSFER OF DATA OUTSIDE THE EEA

- 8.1. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided for by the European law. For this reason, the Controller transfers personal data outside the EEA only where necessary and with an appropriate degree of protection, in particular by:

- 8.1.1. cooperating with personal data processors in countries for which a relevant decision of the European Committee has been issued;
- 8.1.2. applying standard contractual clauses issued by the European Committee;

**8.1.3.** applying binding corporate rules approved by the competent supervisory body;

**8.1.4.** in the event of transferring data to the USA – cooperating with entities participating in the Privacy Shield programme, approved by the decision of the European Committee.

**8.2.** The Controller always informs about the intention to transfer personal data outside the EEA at the stage of collection thereof.

## **9. SAFETY OF PERSONAL DATA**

**9.1.** The Controller conducts a risk analysis on an ongoing basis to ensure personal data is processed by the same in a safe way - ensuring in particular that access to data is given only to authorised persons and only to the extent necessary for the performance of their tasks. The Controller makes sure that all operations on personal data are recorded and carried out by authorised employees and co-workers only.

**9.2.** The Controller takes all necessary measures so that also their subcontractors and other cooperating entities guarantee to apply appropriate safety measures in each case they process personal data on behalf of the Controller.

## **10. CONTACT DETAILS**

**10.1.** The Controller can be contacted by the email address [kodo@tkt.pl](mailto:kodo@tkt.pl) or the correspondence address of TKT Engineering Sp. z o.o., ul. Pryzmaty 4, 02-226 Warszawa.

**10.2.** The Controller has appointed a Personal Data Protection Coordinator who can be contacted by the email address [kodo@tkt.pl](mailto:kodo@tkt.pl) on any matter regarding the processing of personal data.

## **11. CHANGES IN THE PRIVACY POLICY**

**11.1.** The Policy is verified on an ongoing basis and updated, if necessary. The current version of the Policy was adopted on and is effective as of 24 May 2018.