

PERSONAL DATA PROTECTION POLICY

www.velapi.pl

1. GENERAL

- 1.1. This Privacy Policy sets out the rules for the processing of Personal Data in connection with the use of the www.velapi.pl website (hereinafter referred to as the "Website").
- 1.2. The terms used herein shall have the following meanings:
 - 1.2.1. "**Administrator**" has the meaning given to it in Article 3.1 of this Privacy Policy.
 - 1.2.2. "**Cookies**" means Cookies and files in other browser data stores such as Local Storage or Session Storage, i.e. fragments of text that a website sends to your browser and that your browser sends back the next time you visit the website or use locally. Cookies are mainly used to maintain the session, e.g. by generating and sending back a temporary identifier after logging in. However, they can be used more widely, among other things, by remembering any data that can be encoded as a string. This way, you don't have to type in the same information every time they return to that page or go from one page to another.
 - 1.2.3. "**Personal Data**" means personal data within the meaning of Article 4(1) of the GDPR, i.e. any information relating to 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, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
 - 1.2.4. "**Data Protection Policy**" means this document.
 - 1.2.5. "**Terms and Conditions**" means the terms and conditions of the [www.velapi.pl website](http://www.velapi.pl).
 - 1.2.6. "**GDPR**" means 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) (OJ L 119 of 2016, p. 1).
 - 1.2.7. "**Website**" means the www.velapi.pl website with all subpages and the content placed on them.
- 1.3. Any capitalized terms used in this Privacy Policy and not defined in the Privacy Policy shall have the same meaning as in the Terms and Conditions.
- 1.4. This Data Protection Policy is effective upon its publication on the Site.
- 1.5. This Data Protection Policy may be amended in the future by the Administrator depending on the needs of the Website and changes in the environment (including the legal and regulatory environment). If you do not agree to change the content of the Data Protection Policy, you should immediately stop using the Website.

2. GENERAL INFORMATION

- 2.1. Your Personal Data is processed by the Administrator as part of the functioning of the Website in accordance with Article 6(1)(f) of the GDPR, i.e.: due to the necessity of this process for the implementation of the objectives resulting from the legitimate interests pursued by the Administrator and consisting in the implementation of the basic functions of the Website in the field of providing information about Velapi and enabling contact with Velapi, subject to Article 2.3.

- 2.2. Your Personal Data is collected and processed when you use the Website, as well as when you contact the Administrator or other entity related to the Website.
- 2.3. Your Personal Data may be transferred to another administrator in connection with your message sent via the contact form, but in each case this will only happen if you consent to it.
- 2.4. Your Personal Data may be processed by external service providers providing services to the Administrator in the scope of, among others: payment processing, supporting the implementation of website functions (including hosting in cloud computing), sending e-mails, marketing activities, displaying push notifications, analysis of traffic on the Website.
- 2.5. Providing your Personal Data, as well as your consent to their transfer, is completely voluntary. However, failure to provide Personal Data or consent to the provision of Personal Data may result in the functionality of the website being limited or unavailable, e.g. failure to provide your Personal Data may prevent you from sending a message to Velapi due to the fact that the provision of your Personal Data is a necessary part of this process.
- 2.6. Your data may also be processed for marketing purposes or to survey satisfaction with the use of the Website, but only if you agree to such communication being sent to you by the Provider in order to promote the Website and improve its functionality.
- 2.7. The Administrator makes every effort to protect the entrusted Personal Data, including ensuring that the Personal Data is:
 - 1.1.1) processed lawfully, fairly and transparently for the data subject ("lawfulness, fairness and transparency");
 - 1.1.2) collected for specific, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes ("purpose limitation");
 - 1.1.3) adequate, relevant and limited to what is necessary for the purposes for which they are processed ("data minimisation");
 - 1.1.4) correct and updated where necessary; all reasonable steps must be taken to ensure that personal data which are inaccurate in light of the purposes for which they are processed are erased or rectified without undue delay ("accuracy");
 - 1.1.5) stored in a form that permits identification of the data subject for no longer than is necessary for the purposes for which the data is processed ("storage limitation");
 - 1.1.6) processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organizational measures ("integrity and confidentiality").
- 2.8. Notwithstanding the actions taken by the Administrator as described in Article 2.7 above, it should be noted that there are no solutions that guarantee the complete security of any data on the Internet, including Personal Data.

3. PERSONAL DATA ADMINISTRATOR

- 3.1. The Administrator of the Personal Data processed on the Website is the Supplier, i.e. Damian Rogowski conducting business activity under the name "Velapi - Damian Rogowski", NIP 7010919406, REGON 383081148, Krańcowa 63 lok. 47, 02-493 Warsaw ("**Administrator**").
- 3.2. The Administrator has implemented technical and organizational solutions to ensure the security of Personal Data processing and its compliance with the provisions of generally applicable law, and also takes the utmost care to protect your Personal Data on an ongoing basis.

- 3.3. If you want to contact the administrator in order to obtain information about the processing of your Personal Data, you can do so via the e-mail address: contact@velapi.pl.

4. YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

- 4.1. In connection with the processing of your Personal Data, you have the following rights, among others:
- 1.1.1) the right to obtain confirmation from the Administrator as to whether your Personal Data is being processed, and if this is the case - you have the right to access it;
 - 1.1.2) the right to rectify your Personal Data;
 - 1.1.3) the right to have your Personal Data erased (the so-called "right to be forgotten");
 - 1.1.4) the right to restrict the processing of your Personal Data;
 - 1.1.5) the right to receive a notification from the Administrator about the rectification or deletion of your Personal Data or about the restriction of their processing;
 - 1.1.6) the right to transfer your Personal Data;
 - 1.1.7) the right to object to the processing of your Personal Data;
 - 1.1.8) the right to withdraw your consent to the transfer of your Personal Data to another administrator at any time without affecting the lawfulness of the transfer that was made on the basis of your consent before its withdrawal;
 - 1.1.9) the right to lodge a complaint with a supervisory authority within the meaning of the GDPR, i.e. with the President of the Office for Personal Data Protection.
- 4.2. Nothing in the Terms and Conditions or the Data Protection Policy excludes or limits your rights related to the processing of your Personal Data. Please note that giving your consent to the transfer of your Personal Data to another administrator may be a necessary condition for your use of some or all of the Website's functionalities.

5. INFORMATION AND COMPLAINTS

- 5.1. In order to obtain information on the processing of your Personal Data or to report complaints related to this processing, you can contact the Administrator via the e-mail address: contact@velapi.pl (using the note in the title of the e-mail "Personal Data Protection").

6. DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

- 6.1. Your personal data is not subject to automated decision-making, including profiling. Your personal data may be transferred outside the EEA under appropriate legal instruments.
- 6.2. Your Personal Data will be stored and processed by the Website, especially during your use of the Website, with the exception of Cookies, which will be stored on your computer and which you can delete at any time using your web browser.

7. COOKIES and other data stores

- 7.1. The Website uses Cookies and other browser data stores (as defined in Article 1.2.2) in order to increase the convenience and speed of your use of the Website.
- 7.2. You can manage Cookies through your browser (including viewing, deleting, blocking them), however, deleting Cookies, as well as limiting or modifying your browser settings

in relation to Cookies may adversely affect the possibility of using the Website, including - in some cases - may prevent the use of the Website.

7.3. The Website may use the following types of Cookies:

- 1.1.1) necessary - they are necessary for your use of the Website and its functionalities;
- 1.1.2) functional - they are used to improve the efficiency of processes carried out on the Website (including marketing processes);
- 1.1.3) analytical - they allow for the collection of data on Website traffic;
- 1.1.4) marketing - they are used to promote other products, services or events, and in particular to adapt the displayed marketing materials to your preferences;
- 1.1.5) session - they are stored only until the end of the browser session (i.e. its closure);
- 1.1.6) persistent - they are stored also after the end of the browser session.

7.4. List of all Cookies used on the Website:

Name	Purpose	Kind	Store
cmplz—<name>	Cookie banner consents	[necessary] [persistent]	1 year
—ga	User ID for analytics	[analytical] [persistent]	more than year
—ga—<id>	Session ID for analytics	[analytical] [persistent]	more than year