

## **PRIVACY POLICY**

Pursuant to Article 13(1) and (2) of the General Data Protection Regulation of 27 April 2016, I would like to inform you that the Administrator of your personal data is the company ZANO Mirosław Zarotyński, based in Krakow, 7a Lindego Street, e-mail: [biuro@zano.pl](mailto:biuro@zano.pl), tel: 12 636 90 27.

Your personal data will be processed in order to prepare commercial offers in response to your enquiries, to perform the contract, to comply with legal obligations, including tax obligations, and to assert and defend against possible claims under civil law, should they arise.

The information we collect is also used to present you with the best possible offer and to support **marketing and sales** activities, including campaigns and activities carried out by Zano's external partners; it is also used to conduct surveys to analyse customer feedback on our products and services and to improve them.

### **1. The legal basis for processing your personal data is:**

- Article 6(1)(b) RODO, i.e. the processing is necessary for the performance of the contract between us
- Article 6(1)(c) of the RODO, i.e. the processing is necessary for the performance of obligations incumbent on us such financial accounts, including tax accounts
- Article 6(1)(f) RODO, i.e. the processing is indispensable for the purposes of our legitimate interests, such as direct marketing offers to you, advertising and marketing campaigns and the possible need to counter or fulfil civil law claims
- Article 6(1)(a) RODO - processing is based on the consent given by the survey participant.

### **2. Personal data in the process of offer creation and order processing / contract execution**

The recipients of your personal data for the preparation of the offer, for the execution of the contract and for marketing and advertising purposes will be your employees, business partners, postal operators, technical service partners, subcontractors, transport companies, couriers, accounting office, advertising partners.

Your provision of personal data is voluntary, but necessary for the preparation of the offer and the execution of the contract.

### **3. Information on the period of processing of personal data**

Your personal data processed for various purposes will be retained for the period necessary for those purposes and thereafter in accordance with the following:

#### **Data related to the preparation of the offer, conclusion or execution of the contract**

- a. stored for the time needed to prepare and present an offer, perform a contract or analyse the content of surveys.

b. On completion of the contract:

- until the end of the period of limitation for any contractual claims (e.g. claims handling)
- to the extent necessary to comply with legal obligations (e.g. tax or accounting)
- for the archiving of all technical and other arrangements made in the course of preparing an offer or concluding a contract

**Data related to the supply of products, the provision of services and after-sales service:**

processed for the duration of the service or guarantee of the products supplied, to the extent necessary for their proper execution, and thereafter stored for the time necessary to provide an adequate level of after-sales service and in connection with possible claims or defence against them.

**Data related to the offer system (offers.zano.pl):** stored until your account in the system is deleted at your request.

**Data obtained in connection with the surveys**

- kept for the time necessary for the analysis of the survey results.
- in the case of consent to data processing, until such time as consent is withdrawn

**Data processed on the basis of consent:** stored until consent is revoked or an objection is lodged.

**Data obtained in connection with correspondence:** Stored until the statute of limitations for the establishment, assertion or defence of claims.

**Data obtained during the recruitment process:** processed until the end of the recruitment process.

#### **4. Processing of personal data**

Personal data collected via our website, of which we are the Administrator, is obtained by means of forms, e-mails, telephone calls or from connections established by the web browser to our server.

We process this data automatically, using IT solutions and, in the case of the acquisition of data provided to us in written correspondence, also manually.

On our website, third parties - our trusted partners - place cookies and use other similar technologies on your device (e.g. computer, smartphone) to access this device. These partners carry out the above activities in order to tailor, among other things, advertisements or services on our and other websites (whether provided by us or our partners) to your needs / interests.

#### **5. Personal data that you provide to us directly**

The provision of certain data is necessary for the provision of our services, the fulfilment of your requests and the response to your queries and requests. We obtain personal data, for which we are the Data Controller, from you directly in the process of sending and exchanging e-mail correspondence and during telephone conversations (mainly, for the purpose of creating offers and processing orders). The data collection mainly comprises information necessary for the processing of offers, orders and after-sales service, e.g.: company name, address, VAT number,

delivery address, product names and numbers as well as technical documentation sent to our e-mail addresses. We also obtain data from the online quotation form - this includes information on materials, delivery address, non-standard order parameters and others.

## **6. Data collected automatically when using the service**

When you use our websites, we also collect information provided by your browser or the device you use to connect to the internet. This data is analytical and relates to how you use our websites and the purpose of the processing is to continuously improve the mechanisms associated with the adaptation of website content and advertising content. The range of data processed includes, among other things, your IP address, your browser and operating system data, the length of time you spend on the website and the types of content to which your activity relates.

## **7. Information on the legal grounds for processing personal data**

The main purpose of the data processing is to promote products and services, to contact end customers and also to support employee recruitment processes. The legally justified purpose is to collect data, for evidential purposes, to establish the investigation or defence against claims.

The legal basis for the processing of personal data collected for the proper execution of the recruitment process is the obligation under the law to collect and process information about job applicants.

Personal data may also be processed by us in connection with the performance of other legal obligations, for the performance of a contract or on the basis of consent given during data collection or processing

## **8. Information on recipients of personal data**

Data is shared:

- the company's employees, who are duly authorised to process the data and are trained to provide the correct service to the customer and deliver the products
- to trusted partners for customer service and product delivery purposes

## **9. Information on the data subject's rights being exercised. Making requests for the exercise of the data subject's rights. Right to freely give or withdraw consent to data processing. Making requests for the exercise of the data subject's rights. Right of access to personal data.**

You have the right of access to the content of your data. Any requests relating to the processing of your personal data can be sent to the following email address: [biuro@zano.pl](mailto:biuro@zano.pl). You can at any time give or withdraw your consent to the processing of your personal data, among other things, when your data is processed for the promotion of Zano's services and products. You have the right to access the personal data provided to us at any time. You can also correct your personal data. You can delete your personal data or restrict its processing if the data is no longer necessary - in part or in whole - for the purpose for which it was processed, you have decided to delete it or restrict its processing and also in situations where applicable law obliges us to delete

the data. The erasure of the data is limited by the right of the processor to comply with obligations under applicable law and to establish, assert or defend claims. You may object to the processing of your data. You may at any time lodge a complaint relating to the processing of your personal data with a supervisory authority, i.e. the President of the Office for Personal Data Protection, 2 Stawki Street; 00-193 Warsaw. However, we suggest that you first resolve potential disputes directly with us by sending us the relevant information to: [biuro@zano.pl](mailto:biuro@zano.pl). In cases expressly provided for by law, rights regarding the processing of personal data may be restricted.

Your data is processed in our systems by automated means. This may involve profiling, which does not infringe your rights but leads to a better, more effective and more customised presentation of our products and services. The purpose of the automatic data processing, including the collection of data on how users use the website, is a better, more precise and tailored presentation of the products, services and our offerings to you, which also takes the form of marketing of products and services.

## **10. Cookies handling**

Cookies are a technology which records data about your behaviour while using our websites, including the services available on them. ZANO, as well as external service providers, also use other technologies which allow the collection of technical data (e.g. operating system, resolution, web browser and others), e.g. technologies: Session Storage, Local Storage, IndexedDB.

## **11. External service provider codes**

We place code for analytical, advertising tools of external service providers on the pages. These are used to collect data about the availability and correctness of our services, as well as about the behaviour of users of the website.

We use a User Behaviour Analysis tool on our website to better understand how users use our website and improve our services. The data collected by this tool includes behavioural metrics, heat maps and session logging (video recordings) to help us optimise the user experience.

## **12. Types of cookies and other technologies we use**

**Session cookies.** Session cookies are created when the user starts using the website and are active until the user closes the web browser or logs out of the website (in the event that the use of a particular service or function requires a login).

**Permanent (permanent) cookies.** Permanent cookies, like session cookies, are created when the user starts using the website, but do not cease to be active when the browser is switched off or when the user logs out of the website. Permanent cookies are deleted automatically by the browser, at specified intervals or manually by the user.

## **13. The objectives of using the above-mentioned technologies**

- **analytics and statistics** to improve the presentation of services, offer products and optimise service and marketing activities (Cookies, Local Storage, Session Storage, IndexedDB)

- **authentication**, i.e. **user recognition**, **language settings**, **advertising**, i.e. adapting advertising to users' behaviour and preferences (cookies)
- **service configuration** - information about configurations, service settings for a specific user (Cookies, Local Storage)

Browsers allow you to block and delete cookies, but this may involve limiting access or even preventing you from using some of the website's functions. When you first visit the website, we will inform you about the use of cookies and other technologies.

Cookie settings. If you would not like information about your behaviour to be processed automatically using cookies or other technologies, please refer to the instructions for changing your browser settings:

**Google Chrome:** <https://support.google.com/chrome/answer/95647?hl=pl-PL>

**Mozilla Firefox:**

<https://support.mozilla.org/pl/kb/W%C5%82%C4%85czanie%20i%20wy%C5%82%C4%85czanie%20obs%C5%82ugi%20ciasteczek>

**Opera:** <https://help.opera.com/pl/latest/web-preferences/#manageCookies>

**Safari:** [https://support.apple.com/kb/ph21411?locale=pl\\_PL](https://support.apple.com/kb/ph21411?locale=pl_PL)

**Microsoft Edge:** <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

**Microsoft Internet Explorer:** <https://support.microsoft.com/pl-pl/help/278835/how-to-delete-cookie-files-in-internet-explorer>

An up-to-date list of the services of our trusted Partners and Service Providers, whose scripts we include on our websites for the purpose of storing information in cookies and information stores using other technologies, and to whom we may transfer your personal data in connection with the provision of information society services.

SERVICE	WWW ADDRESS	PRIVACY POLICY
Google Analytics	<a href="https://analytics.google.com">https://analytics.google.com</a>	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Google Marketing Platform	<a href="https://marketingplatform.google.com">https://marketingplatform.google.com</a>	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Microsoft Clarity	<a href="https://clarity.microsoft.com/">https://clarity.microsoft.com/</a>	<a href="https://privacy.microsoft.com/pl-pl/privacystatement">https://privacy.microsoft.com/pl-pl/privacystatement</a>