

Cookie Policy

Information for the users of the website

simpleway.com.pl

dated 01 March 2024

1. Who is the data controller?

The Controller for the data processing described below is **SIMPLE WAY sp. z o.o. sp. k.** with its registered office in Międzychód (64-400), at ul. Wigury 20, NIP: 5951455352, (hereinafter referred to as: "**Simple Way**" or "**Controller**").

You can contact the Controller quickly and proficiently at the Controller's registered office, i.e. the address indicated above, and:

- by phone: +48 22 310 21 00,
- by e-mail: rodo@simpleway.com.pl,
- using the contact form available at:
<https://simpleway.com.pl/pl/kontakt.htm>,
- in writing:
SIMPLE WAY sp. z o.o. sp. k.
ul. Wigury 20
64-400 Międzychód.

If you contact the Controller, the Controller may ask for additional information to verify your identity.

Supervision over the observance of personal data protection is exercised by the appointed Data Protection Officer: Piotr Sowa. You can contact the Officer in all matters concerning the processing of personal data by the Controller and exercising the rights relevant to processing personal data.

You can contact the Officer:

- by e-mail: rodo@simpleway.com.pl
- in writing: SIMPLE WAY sp. z o.o. sp. k., ul. Wigury 20
64-400 Międzychód.

This information applies to the simpleway.com.pl platform (the "**Platform**").

All terms should be understood in line with the Platform Terms of Use available at: <https://simpleway.com.pl/en/privacy-policy.htm>.

2. General information

What is personal data? Personal data is information about an identified or identifiable natural person ("data subject"). This includes data such as name, surname, residential address, date of birth, telephone number or e-mail address (the list is not exhaustive).

Personal data are processed under the GDPR, i.e. 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, the "GDPR").

3. Purposes, legal basis and processing period

The periods for processing indicated hereinbelow are to be regarded as maximum periods. This means that if a particular purpose is fulfilled before the end of the stipulated retention period, the Controller shall delete or anonymise the data earlier.

Purpose of the processing	Legal grounds for processing	Retention period
1) Enabling the use of the Platform and ensuring its proper functioning.	The controller's legitimate interest (Article 6(1)(f) GDPR) to run the Platform.	1 year since last visit to the Platform.
2) Replying to an inquiry or other notification sent using the contact form.	The controller's legitimate interest (Article 6(1)(f) GDPR) to carry on the correspondence.	For the period of maintaining ongoing relationships (e.g. answering questions, presenting offers, exchanging correspondence), and for one year after the termination of the relationship.
3) Presentation of the offer (for persons submitting a quotation request on their own behalf).	The processing is necessary for taking steps before entering into a contract (Article 6(1)(b) GDPR).	Until the end of the offer validity.
4) Presentation of the offer (for persons submitting a quotation request on behalf of another entity).	The controller's legitimate interest (Article 6(1)(f) GDPR) to offer and initiate business cooperation.	Until the end of the offer validity.
5) Approving and considering the request based on the GDPR.	Obligation under the GDPR to provide the data subject with information about activities (Article 6(1)(c) GDPR).	5 years from the date of completing handling to the request.
6) Determining and pursuing or defending against claims.	The controller's legitimate interest (Article 6(1)(f) GDPR) to establish, pursue or defend against claims.	Until the limitation period for claims expires.

4. Who can be the recipient of data?

Your personal data may only be transferred to trusted recipients, in particular colleagues, IT service providers, and entities providing postal, courier or legal advice services.

The data is also transferred to companies related personally and financially.

Because we use the services of Microsoft Corporation, your data may be transferred outside the European Economic Area. We have concluded a contract with Microsoft Corporation – the so-called Standard Contractual Clauses. This means that under the European Commission Decision No. 2021/914 EU of 4 June 2021, your personal data may be processed by that company in the USA. More information about the decision is available at:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914>.

5. Rights related to data processing

You have the right to:

- access the data, including obtaining a copy of the data,
- transfer the data,
- rectify the data,
- delete the data,
- limit the processing,
- lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, Warsaw 00-193).

The right to object

Each time your personal data are processed based on the controller's legitimate interest (Article 6(1)(f) GDPR), you may object at any time. You can raise an objection using the contact details provided in section 1.

To learn more about your rights, read the leaflet available at:

<https://www.gov.pl/web/cyfristyczny/rodo-informator>.

6. How can you notify us of your wish to exercise your rights?

You can exercise your rights in person at the Controller's office, by post or by e-mail (the Controller's contact details are provided in section 1).

In response to your request, you may be asked to provide the data necessary to identify your personal data (including finding them) or verify your identity (confirming that you are the person you claim to be).

7. Do you have to provide us with your data?

The provision of data is, in principle, voluntary. Whenever data submission is:

- voluntary, but necessary to achieve specific purposes (e.g. e-mail contact via an online form) or
- obligatory (e.g. it results from legal provisions),

you will be informed about this clearly and separately (e.g. on the form through which personal data is collected).

8. Operational data

Even if cookies are not installed, the website administrator may gain access to data describing how the Platform is used ("operational data"), in particular:

- the IP address assigned to your device or the external IP address of your Internet provider,
- domain name,
- browser type,
- access time,
- type of operating system.

To ensure the highest quality of the website, we occasionally analyse log files to determine which pages are visited most often. We may also collect navigational data, including information about the links and references you choose to click or information about other activities you undertake on the Platform. In this regard, the legal base is the legitimate interest (Article 6(1)(f) of GDPR) to facilitate the use of electronic services and improve the functionality of these services.

The operational data are not combined with information such as name and surname, e-mail address or other data enabling easy identification of the person visiting the website.

Personal data protection and operational data

In certain exceptional situations, information obtained through operational data may constitute personal data within the meaning of the GDPR. If the information indicated above is classified as personal data, the Controller is the personal data controller. Even in case of doubts about whether a specific category of information constitutes personal data, the Controller introduces mechanisms to protect this information as personal data.

For the purpose of ensuring proper operation of the Platform, log files may be occasionally analysed to:

- determine what browsers are used by people visiting the Platform,
- determine which tabs or subpages of the Platform are most often or least frequently visited or viewed,
- determine whether the Platform does not contain errors,
- prevent unauthorised access to the Platform,
- prevent the distribution of malicious codes,
- interrupt denial-of-service attacks,
- prevent damage to computer systems and electronic communications systems.

In the cases of processing your personal data presented above, you have the right to object.

The recipients of this data may be entities providing IT services to the Controller.

- **Deleting operational data**

If we obtain your personal data as part of the services described above, they will be deleted or anonymised no later than after the expiry of the limitation period for potential claims related to the use of the Platform or earlier if you submit an effective objection.