

## **PRIVACY POLICY**

### **Personal Data Controller**

The personal data controller is **VASBOX sp. z o.o.**, Rondo Daszyńskiego 1 00-843, Warsaw, e-mail: kontakt@vasbox.tech (hereinafter referred to also as "us", "we" or "VASBOX").

### **The purpose and scope of personal data collection and the legal basis for the processing of personal data**

We process personal data for the following purposes:

#### **Providing services through the website**

When it comes to offering digital services, encompassing the dissemination of website content to users, the legal basis for processing is the necessity of processing to perform the contract referred to in Article 6(1)(b) of GDPR.

#### **Analytics**

For the purpose of carrying out analytical and statistical tasks, involving the examination of user activities and preferences to enhance the website's features and offerings, the legal foundation for these procedures is the user's explicit agreement granted through the cookie pop-up in accordance with cookie section below.

#### **Contacting**

VASBOX processes personal data to engage with individuals who reach out to us through phone calls, electronic means, or regular mail. The purpose of VASBOX is to address queries, furnish details, reply to requests, provide information as requested, and handle inquiries effectively. The purpose of processing is the legitimate interest of VASBOX, depended on providing contact on the demand of the data subject referred to in Article 6(1)(f) of GDPR.

VASBOX retains the data handled for communication purposes for the duration required to finalize the communication, address inquiries, and deliver requested materials. Subsequently, VASBOX keeps this data until the resolution of the matter or the termination of the communication. Additionally, VASBOX stores correspondence for a similar timeframe to serve as evidence, protect potential claims, or support its defence against them, which is our legitimate interest referred to in Article 6(1)(f) of GDPR.

#### **Providing direct marketing**

VASBOX processes personal data for the purpose of sending the newsletter to people who have agreed to receive it. The basis for the processing of this personal data is the consent indicated in Article 6(1)(a) of GDPR. VASBOX stores such data until the consent is revoked.

If the user is interested in such service, he or she may also receive information from us in the form of a newsletter regarding services related to the protection of personal data, provided by companies that are our business partners (and provide information security services, help in obtaining a liability insurance policy protecting against financial consequences resulting from with GDPR). For this purpose, the person has the option of giving separate consent and the data will be stored by us until its withdrawal.

### **Direct marketing**

If you are a representative of our client or business partner, or a person with whom we contact in connection with cooperation with such an entity, we may process your personal data for the purpose of contact (in paper form) bearing the features of direct marketing (by sending occasional correspondence). Such direct marketing is our legitimate interest depended on providing direct marketing to data subjects who consented to it, and the legal basis for data processing is Article 6(1)(f) of GDPR with connection with consent. We process the data for this purpose for the duration of the cooperation.

### **Legal claims**

In the event of potentially initiating or pursuing legal claims, or safeguarding against such claims, the lawful basis for data processing is established on the legitimate interests of the controller referred to in Article 6(1)(f) of GDPR, depended on the defence of the economic interests of the VASBOX.

### **Data sources**

We collect data directly from you if you call us, or correspond with us by e-mail or by traditional means, or leave it in another. We can also obtain your data from companies with which we cooperate and which indicate you as a representative or competent contact person. The data we receive in this case are business contact details, or in proper cases data included in the power of attorney or an excerpt from the National Court Register.

### **Data recipients**

Personal data may be disclosed to employees or associates of VASBOX, entities providing support to the Company on the basis of outsourced services and in accordance with the entrustment agreements concluded (e.g. suppliers from the areas of: accounting, marketing agency, hosting, website management), entities providing postal and courier services and entities authorized under the law.

Where we do share your data with third parties, the shared data will be limited to that which is required by the third party to provide the required processing. In such cases your personal data is safeguarded by Data Processing Agreements, committing outsourced service providers to process your personal data for specified purposes and in accordance with our instructions, comply with the GDPR and apply appropriate security measures to protect your personal information in line with our internal policies. All transfers outside of the EEA made to countries

which are considered by the European Commission to not provide an adequate level of protection of personal information are safeguarded with agreement based on Standard Contractual Clauses approved by the European Commission.

## **Rights of natural persons**

You have the following rights:

- the right to access your personal data (Article 15 of GDPR), including obtaining a copy of the data (Article 15(3) of GDPR),
- the right to rectify (correct) or supplement incomplete personal data (Article 16 of GDPR),
- the right to request the deletion of personal data in cases provided for by law (Article 17 of GDPR),
- the right to submit a request to limit the processing of personal data (Article 18 of GDPR),
- the right to receive your data in a structured, commonly used format and their transfer when the processing is based on your consent, and also when the processing is carried out in an automated manner (Article 20 of GDPR),
- the right to object to the processing of your personal data in the event of their processing in order to implement the legitimate interest of the Company, for reasons related to your particular situation (Article 21 of GDPR),
- in cases where the processing of data takes place on the basis of the consent granted, you have the right to withdraw the granted consents at any time but without affecting the lawfulness of processing before their withdrawal. You can withdraw your consent by sending a message to the VASBOX address; You can also opt out of receiving the direct marketing sent to you with your consent by using the link contained in each newsletter message,
- in cases you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint with the supervisory body, i.e. the President of the Personal Data Protection Office based in Warsaw. Details on submitting complaints can be found on the President of the Personal Data Protection Office website at: [uodo.gov.pl/en](https://uodo.gov.pl/en).

## **Voluntary data provision**

Providing personal data is voluntary but it may be necessary if the Website User wants to take advantage of some of the possibilities we offer, for example to send a newsletter we need your e-mail address and to answer questions we need your contact details.

## **Cookies and similar technology**

Cookies are small text files installed on your device (as a User) browsing our website (Website). Cookies collect information that facilitates the use of the website – e.g. by remembering the User's visits to the Website and the activities performed by him.

- **Necessary cookies**

We use necessary cookies primarily to offer the User electronically provided services. These cookies encompass data entered by the User (session ID) for the duration of the session (user input cookies).

- **Analytical cookies**

We employ analytical cookies to enhance the quality of services available on the Website. Hence, both we and other entities offering analytical and statistical services to us utilize cookies to store or access information already present on the User's communication terminal (computer, phone, tablet, etc.). These cookies encompass Google Analytics cookies used to assess the User's interaction with the Website, generate statistics, and compile reports on the Website's operation.

- **Marketing cookies**

We employ analytical cookies to enhance the quality of services available on the Website. Hence, both we and other entities offering analytical and statistical services to us utilize cookies to store or access information already present on the User's communication terminal (computer, phone, tablet, etc.). These cookies encompass Google Analytics cookies used to assess the User's interaction with the Website, generate statistics, and compile reports on the Website's operation.

### **Managing cookie settings**

Necessary cookies essential for website usage are automatically set up on the User's device. Their application is critical to provide a telecommunications service (transmitting data to display content) – opting out of these cookies isn't possible if the User intends to use the Website.

We don't automatically deploy analytical cookies. Users can allow us to use analytical cookies by granting consent upon visiting the website.

Users can agree to the installation of analytical cookies by clicking the "Accept" button on the banner that emerges after accessing the website. This grants us permission to establish analytical cookies as per the User's browser settings (where default settings typically install all cookies).

Users have the option to consent solely to specific analytical cookies. To do so, they can click the "Manage cookies" button on the banner after entering the website, selecting the cookies they wish to permit.

The User maintains the right to revoke granted consent whenever desired. To achieve this, the User can click the icon in the lower left corner and choose to withdraw their consent.

Withdrawing consent regarding cookie usage is also viable through browser settings. For more information, refer to the following links:

Internet Explorer  
Mozilla Firefox

[Internet Explorer](#)  
[Mozilla Firefox](#)

Google Chrome  
Opera  
Safari

Google Chrome  
Opera  
Safari

In the absence of consent or in the event of withdrawal of consent for a given type and provider of cookies (if the installation of cookies is not accepted in accordance with the browser settings), our Company does not install such cookies on the User's end device.