

PRIVACY POLICY

The privacy policy of the Constans Grupa website available at www.constansgrupa.pl.

Thank you for visiting our web Site's page available at <http://constansgrupa.pl> (hereinafter: „**Internet based-Service**”, „**Constans Grupa Website**”).

We care about your privacy and we would like you to feel comfortable while using the services offered on our website. Therefore, we present below the most important information regarding the principles of processing your personal data by us and cookies that are used by our Website.

This information has been prepared taking into account the GDPR - **General Data Protection Regulation**

Please read the privacy policy

1) GENERAL PROVISIONS

1. The present privacy policy has an informational nature what means that it is not a source of obligations for the recipients of the services of the Internet-based service. The privacy policy contains first of all the principles related to the processing of personal data by the Administrator, including the bases, purposes and the scope of personal data processing as well as the rights of the persons to whom they are related and also information related to the use of cookie files in the Internet based-Service.
2. The administrator of the personal data, which are collected via the Internet-based Service is the company Constans Grupa Limited Liability Company with its registered office in Poznań, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court Poznań - Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register under number 0000150718, registered office and address for service: ul. Polska 13, 60-595 Poznań, share capital in the amount of: PLN 50,000 (paid up in full), Polish Tax Identification Number NIP: 778-00-00-998, Polish Statistical Identification Number REGON: 001283170, e-mail address: biuro@constansgrupa.pl (hereinafter: the Administrator).
3. Contact details of the personal data coordinator appointed by the Administrator: Patrycja Opszała, correspondence address: ul. Polska 13, 60-595 Poznań, e-mail address: p.opszala@constansgrupa.pl; contact phone: 601 444 411.
4. The personal data in the Internet-based Service are processed by the Administrator in accordance with the provisions of law being in force, in particular in accordance with the 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) - hereinafter „**GDPR**” or „**General Data Protection Regulation**”.
5. Using the Website and providing personal data by the user is voluntary, subject to the following. Providing personal data is necessary to use the services (i.e. submit an inquiry) or to receive information about the offer, if the Website user decides to receive them.

2) BASES OF THE DATA PROCESSING

1. The Administrator is authorised to process the personal data in the cases when - and within such a scope, in which at least one of the following conditions is met: (1) the person to whom the data are related, has expressed the consent to the processing of his/ her personal data for one purpose or for a bigger number of purposes; (2) the processing is indispensable for the execution of the contract to which such a person to whom the data are related is a party or for the taking of actions at the demand of the person to whom the data are related, before the conclusion of the contract; (3) the processing is indispensable for the fulfilment of the legal obligation being incumbent on the Administrator; Or (4) the processing is indispensable for the purposes resulting from legally justified interests being realised by the Administrator or by a third party.

3) PURPOSE, BASIS, PERIOD AND SCOPE OF PROCESSING OF DATA

1. Each time the purpose, the basis, the period and the scope and the recipients of personal data being processed by the Administrator result from the actions being taken by a given Recipient of services or by the Client in the Internet-based Service.
2. The Administrator may process the personal data in the Internet-based Service for the following scope:

Purpose of the data processing	The legal basis of the processing and the period of the storage of data	The scope of the processed data
Performing a contract / service for or an Electronic Service or taking action at the request of the data subject, before concluding the above-mentioned contracts	<p>Article 6 paragraph 1 letter b) of the General Data Protection Regulation.</p> <p>The data are stored during a period being indispensable for the execution, for the dissolution or for the expiry in another way of the concluded contract.</p>	<p>The maximal scope: first name and surname, e-mail address, contact telephone number.</p> <p>In case of Reipients of services or of Clients who are not consumers, the Administrator may process in addition the business name of the company, the address of the conduct of the business/ of the registered office and the tax identification number (NIP).</p>
Keeping of the accounting books	Article 6 paragraph 1 letter c) of the General Data Protection Regulation in connection with article 74 paragraph 2 of the Act of Parliament on accounting dated	The first name and the surname, the address of the residence/ of the conduct of business/ of the registered office, business name of the company and the tax identification number (NIP)

	<p>30th January 2018 (Law gazette of 2018, item 395)</p> <p>The data are stored during the period required by the provisions of law.</p>	
<p>Using the Constans Grupa Website and ensuring its proper functioning</p>	<p>Article 6 paragraph 1 letter f) of the General Data Protection Regulation (legitimate interest of the administrator); processing is necessary for the purposes of the Administrator's legitimate interests consisting in running and maintaining Constans Grupa Website</p> <p>The data are kept during the period of the existence of the legally justified interest being realised by the Administrator, not longer, however, than during the prescription of claims in relation to the person to whom the data are related, on account of the business activity conducted by the Administrator. The prescription is defined by the provisions of law, in particular of the Civil Code (the basic term of prescription for claims connected with the conduct of business activity amounts to three years and for a contract of sale it amounts to two years).</p>	<p>The maximal scope: IP number, location data, Website traffic source.</p>
<p>Marketing of the services and products of the Administrator</p>	<p>Article 6 paragraph 1 letter a) of the General Data Protection Regulation (consent)</p> <p>The data are stored until the moment of the withdrawal of the consent by the person to whom the data are related, to the further processing of his/ her data for this purpose.</p>	<p>The maximal scope: first name and surname, address (street, number of the house/ flat, postal ZIP, locality: town/ village), e-mail address, contact telephone numer.</p>

<p>Keeping statistics and analysing Website traffic</p>	<p>Article 6 paragraph 1 letter f) of the General Data Protection Regulation (legitimate interest of the administrator); processing is necessary for the purposes of the Administrator's legitimate interests consisting in keeping statistics and analysing traffic on the Constans Grupa Website in order to improve its functioning and increase the sales of the Services.</p> <p>The data are kept during the period of the existence of the legally justified interest being realised by the Administrator, not longer, however, than during the prescription of claims in relation to the person to whom the data are related, on account of the business activity conducted by the Administrator. The prescription is defined by the provisions of law, in particular of the Civil Code (the basic term of prescription for claims connected with the conduct of business activity amounts to three years and for a contract of sale it amounts to two years).</p>	<p>The maximal scope: IP number, location data, Website traffic source.</p>
<p>TV Monitoring</p>	<p>Article 6 paragraph 1 letter f) of the General Data Protection Regulation (legitimate interest of the administrator); processing is necessary to ensure the safety of people staying at the Administrator's premises, and property protection. Monitoring is carried out 24 hours a day and covers the area of the Administrator's seat and the adjacent area.</p> <p>CCTV recordings are stored during 21 days from the date of recording. CCTV monitoring is carried out with</p>	<p>The scope: image, appearance and clothing special features.</p>

	<p>respect for the dignity and personal rights of the people concerned. Recorded materials will be used only in the above-mentioned purposes, and will be accessed only by persons authorized to the personal data processing and legal entities.</p> <p>Each of the authorized persons is obliged to maintain the secrecy resulting from these materials.</p> <p>In the case of the image recordings being evidence in legal proceedings or the Company learning that they may constitute evidence in proceedings, the time limit shall be extended until the proceedings are legally concluded.</p>	
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4) THE RECEIVERS OF DATA

1. For the correct operation of the Internet-based Service, including the realisation/ execution of the contracts for the provision of services being concluded, it is necessary that the Administrator uses the services of external entities (such as for example the provider of software, the IT company). The Administrator uses exclusively the services of such processing entities, which provide sufficient guarantees of the implementation of appropriate technical and organisational means so as the processing meets the requirements of the General Data Protection Regulation and so as that it protects the rights of the persons to whom the data are related. The personal data are not transferred neither to any third-party state nor to any international organisation.
2. The transmission of data by the Administrator does not take place in each case and it is not made to all the recipients or categories of recipients who are designated in the privacy policy - the Administrator transmits the data exclusively when it is indispensable for the realisation of a given purpose of processing of personal data and only within the scope being indispensable for its realisation.
3. The personal data of the Recipients of services and of Clients of the Internet-based Service may be transmitted to the following recipients or categories of recipients
 - 1) For users visiting the Website:
 - hosting companies that provide space on servers,
 - suppliers of tools used for marketing or analytical purposes - unless the user raises an effective objection to such processing of his data. In the case of services based on cookies, the objection may be expressed in particular through the browser settings.
 - 2) For all Services:
 - hosting companies that provide space on servers,

- persons cooperating with the Administrator on the basis of civil law contracts, supporting the current activity,
 - Internet service providers (in particular Google)*,
 - software providers that allow collecting opinions of Website users,
 - suppliers of software for customer service and potential customers,
- 3) In the case of sending the parcel to the recipient by traditional means also: - a company providing courier / postal services.
 - 4) Providers of services who provide the Administrator with technical solutions, with IT solutions and with organisational solutions, which make it possible for the Administrator to conduct business activities, including the Internet-based Service (in particular providers of computer software for the operation of the Internet-based Service, IT companies and providers of e-mail and of hosting, CCTV and helpline platform, as well as providers of software for the management of the company, of the marketing actions and for the provision of technical assistance to the Administrator) - the Administrator makes the collected personal data of the Client or of the Recipient of the services available to the provider who acts at his request only in case and within the scope being indispensable for the realisation of a given purpose of the processing of data being compliant with the present privacy policy.
 - 5) The provider of accounting services, of legal services, of advisory/ consulting services and of translation services who assures the accounting support, the legal support, the consulting support or the linguistic support for the Administrator (in particular the accounting firm, the law office or the translation agency) - the Administrator makes the collected personal data of the Client available to the provider who acts at his request only in case and within the scope being indispensable for the realisation of the given purpose of the processing of data being compliant with the present privacy policy.

5) PROFILING IN THE INTERNET-BASED SERVICE

On our Internet-based Service, we do not adjust the content to the interests and needs of users, i.e. we do not perform profiling using data.

6) RIGHTS OF DATA SUBJECTS

1. The right to access, to rectify, to limit, to remove or to transfer - the person to whom the data are related, has the right to demand the administrator to give access to his/ her personal data, to rectify them, to remove them (“the right to be forgotten”) or to limit the processing and he/ she has the right to submit an objection to the processing and also, he/ she has the right to transfer his/ her data. The detailed conditions of the exercising of the rights mentioned above, are indicated in articles from 15 to 21 of the General Data Protection Regulation.
2. The right to withdraw the consent at any time – the person whose data are being processed by the Administrator on the basis of the expressed consent (on the basis of article 6 paragraph 1 letter a) or of article 9 paragraph 2 letter a) of the General Data Protection Regulation has the right to withdraw the consent at any time without impact on the compliance of the processing with law which was made on the basis of such a consent before its withdrawal.

3. The right to submit a complaint to the supervisory body – the person whose data are being processed by the Administrator, has the right to submit a complaint to the supervisory body in the manner and according to the procedure defined in the provisions of the General Data Protection Regulation and of Polish law, in particular of the Act of Parliament on the protection of personal data. The Supervisory Body in Poland is the President of the Office for the Protection of Personal Data.
4. The right to object - the person to whom the data are related, has the right at any time to make an objection - due to reasons connected with his/ her specific situation - against the processing of the personal data related to him / her based on article 6 paragraph 1 letter e) (public interest or tasks) or f) (legally justified interest of the administrator), including the profiling on the basis of these provisions. In such a case the Administrator has not to process these personal data unless the Administrator demonstrates the existence of important legally justified bases for processing, which are superior to the interests, rights and freedoms of the person to whom the data are related or of bases of the establishment, enforcement or defence of claims.
5. Right to object against direct marketing - if the personal data are processed for the needs of direct marketing, the person to whom the data are related, has the right at any time to make an objection against the processing of the personal data related to him/ her for the needs of such marketing, including profiling, within the scope, in which such processing is connected with such direct marketing.
6. In order to realise the rights, which are mentioned in the present point of the privacy policy, one may contact the Administrator by means of sending an appropriate message in writing or by e-mail to the address of the Administrator or of the coordinator responsible for the protection of data of the Administrator, which is indicated at the beginning of the privacy policy.

7) COOKIES IN THE INTERNET BASED SERVICE AND ANALYTICS

1. The Cookie files (cookies) are small textual pieces of information in the form of text files, sent by the server and recorded at the side of the person who visits the page of the Internet-based Service (for example on the hard disk of a computer, of a laptop or on the memory card of a smart phone - depending on what device is used by the person who visits our Internet-based Service).
2. The Administrator may process the data contained in the Cookie files during the use of the page of the Internet-based Service by the visitors for the following purposes:
 - a. realisation of the basic functionalities of the Internet-based Service such as the identification of Recipients of services as logged in users and the keeping of the login session, the storage of dynamic data, for example statistics, summaries;
 - b. adjustment of the content of the Internet-based Service to the individual preferences of the Recipient of services (for example related to the language);
 - c. memorization of IP locations, of the time zone;
 - d. keeping of anonymous statistics, which present the manner of using the Internet-based Service;
2. On a standard basis the majority of Web Browsers being available on the market accept by default the recording of Cookie files. Everybody has the possibility of defining the conditions of the use of the Cookie files by means of the settings of his/ her own Web Browser. This means that one may for example limit partially (for example temporarily) or completely switch off the possibility of recording the Cookie files - in the latter case,

this may have, however, an impact on some functionalities of the Internet-based Service/ Web Site (accidentally it might turn out to be impossible to go along the path of the order via the order form due to the lack of memorization of the Services in the basket during the successive steps of the placement of the Order).

3. The settings of the Web Browser, which are related to the Cookie files, are important from the point of view of the consent to the use of the Cookie files within Constans Grupa Website - in accordance with the provisions such a consent may be also expressed by means of the settings of the Web Browser. In case of lack of the expression of such a consent one has to change the settings of the Web Browser in an appropriate way with respect to the Cookie files.
4. The detailed information on the change of the settings related to the Cookie files and on their elimination by oneself in the most popular Web Browsers are available in the Technical Support Department of the given Web Browser and on the following Web Sites (one has just to click on the appropriate link):
[In the Chrome Browser](#)
[In the Firefox Browser](#)
[In the Internet Explorer Browser](#)
[In the Opera Browser](#)
[In the Safari Browser](#)
[In the Microsoft Edge Browser](#)
5. In the Internet-based Service the Administrator may use the services of Google Analytics, provided by Google LLC. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). These services help the Administrator to keep statistics and analyse the traffic on the Constans Grupa Website. The gathered data are processed in the framework of the above-mentioned services to generate statistics necessary in administering and analysing traffic on the Website. These data have a collective and anonymous nature, i.e. they do not contain identification features (personal data) of the person, who visits the page of the Internet-based Service. While using the above-mentioned services in the Internet-based Service the Administrator gathers such data as the sources and the medium of the acquisition of the visitors of the Internet-based Service and the manner in which they behave in the Internet-based Service; the information on the devices and browsers from which they visit the site, the IP and the domain, the geographic data as well as the demographic data (age, sex) and interests.
6. It is possible for a given person to block easily the information about his/ her activities on a page of the Internet-based Service for Google Analytics - for this purpose one may install a supplement to the browser, which is being made available by Google Inc. by clicking here:
<https://tools.google.com/dlpage/gaoptout?hl=pl>.

8) FINAL PROVISIONS

1. The Internet-based Service may contain links to other Web Sites. The Administrator encourages that after the passage to other Web Sites, one should get acquainted with the privacy policy defined there. The present privacy policy is related only to the Internet-based Service of the Administrator.