



## PRIVACY POLICY

### 1. DEFINITIONS

1.1. Administrator - Trackimo CEE sp. O.o. . with headquarters in Warsaw.

1.2. Personal data - all information about a physical person identified or identifiable by one or more specific factors determining physical, physiological, genetic, psychological, economic, cultural or social identity, including device IP, location data, internet identifier and information collected through cookies and other similar technology.

1.3. Policy - this privacy policy.

1.4. GDPR - Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC.

1.5. Shop - online store run by the Administrator at [shop.trackimo.eu](http://shop.trackimo.eu).

1.6. User - any natural person visiting the Store or using one or several services or functionalities described in the Policy.

### 2. PROCESSING OF DATA IN CONNECTION WITH THE USE OF THE STORE

2.1. In connection with the User's use of the Store, the Administrator collects data in the scope necessary to provide particular services offered, as well as information on the User's activity in the Store. The detailed principles and purposes of processing personal data collected during the use of the Store by the User are described below.

### 3. OBJECTIVES AND LEGAL BASIS FOR PROCESSING DATA IN THE STORE

#### USING THE SHOP.TRACKIMO.EU STORE

3.1. Personal data of all persons using the Store (including the IP address or other identifiers and information collected via cookies or other similar technologies), and not being registered Users (ie persons without a profile in the Store) are processed by the Administrator:

3.1.1. in order to provide services electronically in the field of content available to Users collected in the Store, provision of contact forms - then the legal basis for processing is the necessity of processing to perform the contract (Article 6 (1) letter b of the GDPR);

3.1.2. in order to service purchases made without registration in the Store - then the legal basis for processing is the necessity of processing to perform the contract (Article 6 paragraph 1 letter b) of the GDPR);

3.1.3. in order to handle the complaint - then the legal basis for processing is the necessity of processing to perform the contract (Article 6 (1) (b) of the GDPR);

3.1.4. for analytical and statistical purposes - then the legal basis for processing is the Administrator's legitimate interest (Article 6 (1) (f) of the GDPR which involves analyzing the Users' activity, as well as their preferences to improve the functionalities and services provided;

3.1.5. in order to possibly set and enforce claims or defend against them - the legal basis of the processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) consisting in the protection of its rights;

3.1.6. for marketing purposes of the Administrator and other entities, in particular related to the presentation of behavioral advertising - the principles of processing personal data for marketing purposes are described in the "MARKETING" section.

The User's activity in the Store, including his personal data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and activities regarding the IT system used to provide services by the Administrator). The information collected in the logs is processed in connection with the provision of services. The administrator also processes them for technical purposes, in particular, the data can be temporarily stored and processed to ensure the security and proper functioning of IT systems, e.g. in connection with backups, tests of changes in information systems, detection of irregularities or protection against abuse and attacks .

#### REGISTRATION IN SHOP.TRACKIMO.EU STORE

3.2. Persons who register at the Store are requested to provide the data necessary to create and service the account. In order to facilitate the service, the User may provide additional data, thereby agreeing to their processing. Such data can be deleted at any time. Providing data marked as mandatory is required to set up and service an account, and failure to do so results in the inability to set up an account. Providing other data is voluntary.

3.3. Personal data is processed:

3.3.1. in order to provide services related to running and servicing an account in the Shop - the legal basis for processing is the necessity of processing to perform the contract (Article 6 paragraph 1 letter b) and in the area of data provided optional - the legal basis for processing is consent (Article 6 paragraph 1 letter and GDPR);

3.3.2. for analytical and statistical purposes - the legal basis for processing them the legitimate interest of the Administrator (Article 6 paragraph 1 point f) of the GDPR consisting in analyzing the activity of Users in the Store and the manner of using the account, as well as their preferences to improve the functionalities used,

3.3.3. in order to possibly set and enforce claims or defend against them - the legal basis for processing is a legitimate interest of the Administrator (Article 6 (1) letter f) of the GDPR consisting in the protection of its rights.

3.3.4. for marketing purposes of the Administrator - the rules for the processing of personal data for marketing purposes are described in the "MARKETING" section .

3.4. If the User places any personal data of other people in the Store (including their name, address, telephone number or e-mail address), they can do so only if they do not violate applicable law and personal rights of such persons.

## SUBMISSION OF CONTRACTS

3.5. Placing an order (purchase of goods or services) by the Store User involves the processing of his personal data. Providing data marked as mandatory is required in order to accept and service the order, and failure to do so results in the lack of its implementation. Providing other data is optional.

3.6. Personal data is processed:

3.6.1. in order to execute the order - the legal basis for processing is the necessity of processing to perform the contract (Article 6 (1) (b) of the GDPR); for optional data, the legal basis for processing is consent (Article 6 (1) (a) and (GDP)),

3.6.2. in order to fulfill statutory obligations imposed on the Administrator, resulting in particular from tax regulations and accounting regulations - the legal basis for processing is the legal obligation (Article 6 paragraph 1 letter c) of the GDPR)

3.6.3. for analytical and statistical purposes - the legal basis of the processing is the legitimate interest of the Administrator (Article 6 point 1 letter f) and the analysis of the Users' activity in the Store, as well as their purchase preferences for the improvement of the functionalities used,

3.6.4. in order to possibly establish and enforce claims or defend against them - the legal basis for processing is a legitimate interest of the Administrator (Article 6 paragraph 1 letter f) of the GDPR consisting in the protection of its rights. CONTACT CARDS

3.7. The administrator provides the option of contacting him using online chat. Using the form does not require providing personal data necessary to contact the User and reply to the request, but the user can provide personal data and other data to facilitate contact or service of the inquiry.

3.8. Personal data is processed:

3.8.1. in order to identify the sender and handle his inquiry sent by the provided form - the legal basis for processing is the necessity of processing for the performance of the contract for the provision of services (Article 6 (1) (b) of the GDPR)

3.8.2. for analytical and statistical purposes - the legal basis of the processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) by keeping statistics of inquiries reported by Users via the Store in order to improve its functionality.

## 4. MARKETING

4.1. The Administrator processes Users' personal data in order to carry out marketing activities that may consist in:

4.1.1. displaying to the User marketing content that is adapted to their preferences (contextual advertising);

4.1.2. displaying to the User marketing content corresponding to their interests (behavioral advertising);

4.1.3. directing e-mail notifications about interesting offers or content, which in some cases contain commercial information;

4.1.4. conducting other types of activities related to direct marketing of goods and services (sending commercial information by electronic means and telemarketing activities) .

4.2. In order to implement marketing activities, the Administrator uses profiling in some cases. It means that thanks to the automatic data processing, the Administrator evaluates selected factors concerning natural persons in order to analyze their behavior or create a forecast for the future.

#### CONTEXTUAL CONTEXT

4.3. The Administrator processes Users' personal data for marketing purposes in connection with the targeting of Contextual Ads to Users (ie advertising that matches User's preferences). The processing of personal data takes place then in connection with the legitimate interest of the Administrator (Article 6 (1) letter f). BEHAVIORAL AGREEMENT

4.4. The Administrator processes Users' personal data, including personal data collected through cookies and other similar technologies, for marketing purposes in connection with the targeting of behavioral advertising to Users (ie advertising that is tailored to the User's preferences). The processing of personal data also includes profiling of Users. The use of collected through intermediaries this technology of personal data for marketing purposes, in particular in the field of promoting services and goods of third parties, takes place on the basis of the legitimate interest of the administrator and only on the condition that the User has agreed to the use of cookies. Consent to the use of cookies can be expressed through the appropriate configuration of the browser, and can also be withdrawn at any time, in particular by clearing the cookie history and disabling cookies in the browser settings.

4.5. This consent may be withdrawn at any time.

#### MARKETMARKETING

4.6. If the User has agreed to receive marketing information via e-mail, SMS and other electronic communication means, the User's personal data will be processed for the purpose of sending such information. The basis for data processing is the legitimate interest of Trackimo, consisting in sending marketing information within the limits of the consent given by the User (direct marketing). The User has the right to object to the processing of data for direct marketing purposes, including profiling. The data will be stored for this purpose for the duration of the legitimate interest of Trackimo, unless the User objects to the receipt of marketing information.

#### 5. CONSUMER PORTALE

5.1. The administrator processes personal data of Users visiting Administrator profiles carried out in social media (Facebook, YouTube, Instagram, Twitter, Google +). These data are processed only in connection with running a profile, including to inform Users about the activity of the Administrator and to promote various types of events, services and products, as well as to communicate with users via the functionality available in social media. The legal basis for the processing of personal data by the Administrator for this purpose is its legitimate interest (Article 6 (1) letter f) of the GDPR, which consists in promoting its own brand and building and maintaining a brand-related society.

#### 6. COOKIES AND LIKE TECHNOLOGY

6.1. Cookies are small text files installed on the device of the User browsing the Store. Cookies collect information that facilitates the use of the website - for example, by memorizing the User's visits to the Store and its activities.

#### "SERVICE" PRODUCTS

6.2. The administrator uses the so-called service cookies primarily to provide the User with services provided electronically and to improve the quality of these services. Therefore, the Administrator

and other entities providing its analytical and statistical services use cookies by storing information or accessing information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). Cookies used for this purpose include:

6.2.1. cookies with data entered by the User (session ID) for the duration of the session (user input cookies);

6.2.2. authentication cookies used for services requiring authentication for the duration of the session (authentication cookies);

6.2.3. cookies used to ensure security, e.g. used to detect user centric security cookies;

6.2.4. session cookies of multimedia players (eg flash player cookies), for the duration of the session (multimedia player session cookies);

6.2.5. permanent cookies used to personalize the User interface for the duration of the session or a bit longer (user interface customization cookies),

6.2.6. cookies used to store cart contents for the duration of the session (shopping cart cookies)

6.2.7. cookies used to monitor traffic on the website, i.e. data analytics, including Google Analytics cookies (these are files used by Google to analyze how the User uses the Store, to create statistics and reports on the functioning of the Store). Google does not use the collected data to identify you or link this information to enable identification. Detailed information about the scope and rules of data collection in connection with this service can be found at:

<https://www.google.com/intl/pl/policies/privacy/partners>.

## COOKIES "MARKETINGOWE"

6.3. The administrator also uses cookies for marketing purposes, including in connection with the targeting of behavioral advertising to Users. For this purpose, the Administrator stores information or accesses information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). The use of cookies and personal data collected through them for marketing purposes, in particular as regards the promotion of services and goods of third parties, requires obtaining User's consent. This consent can be expressed through the appropriate configuration of the browser, and can also be withdrawn at any time, in particular by clearing the cookie history and disabling cookies in the browser settings.

## 7. PERIOD OF PROCESSING OF PERSONAL DATA

7.1. The period of data processing by the Administrator depends on the type of service provided and the purpose of the processing. As a rule, the data is processed for the duration of the service or contract performance, until the consent is withdrawn or effective opposition to the data processing is filed in cases where the legal basis for data processing is the Administrator's legitimate interest.

7.2. The data processing period may be extended if the processing is necessary to establish and assert any claims or defend against them, and after that time only in the case and to the extent required by law. After the processing period, the data is irreversibly deleted or anonymized.

## 8. USER AUTHORIZATIONS

8.1. Data subjects have the following rights:

8.1.1. The right to information about the processing of personal data - on the basis of the person submitting such a request, the Administrator provides information about the processing of personal

data, primarily about the purposes and legal grounds of processing, the scope of data held, entities to which personal data are disclosed and the date of their removal ;

8.1.2. The right to obtain a copy of data - on this basis, the Administrator provides a copy of the data processed concerning the person making the request,

8.1.3. Right to rectify - on this basis, the Administrator removes any non-conformities or errors regarding personal data being processed, and completes or updates them if incomplete or changed,

8.1.4. The right to delete data - on this basis, you can request deletion of data, the processing of which is no longer necessary to carry out any of the purposes for which they were collected,

8.1.5. The right to limit processing - on this basis, the Administrator ceases to conduct operations on personal data, except for operations agreed to by the data subject and their storage, in accordance with accepted retention rules, or until the reasons for limiting data processing (e.g. a decision of the supervisory authority will be issued, allowing the further processing of data),

8.1.6. The right to data transfer - on this basis, to the extent to which data is processed in relation to the concluded contract or consent, the Administrator issues data provided by the person concerned in a format that allows them to be read by the computer. It is also possible to request that data to be sent to another entity - provided, however, that there are technical possibilities in this regard, both on the part of the Administrator and that other entity,

8.1.7. The right to object to the processing of data for marketing purposes - the data subject may at any time object to the processing of personal data for marketing purposes, without the need to justify such objection;

8.1.8. The right to object to other purposes of data processing - the data subject may at any time object to the processing of personal data based on the justified interest of the Administrator (eg for analytical or statistical purposes or for reasons related to the protection of property). An objection in this respect should include a justification and is subject to the Administrator's assessment;

8.1.9. The right to withdraw consent - if the data are processed on the basis of consent, the data subject has the right to withdraw it at any time, which however does not affect the lawfulness of the processing carried out prior to the withdrawal of the consent,

8.1.10 Right to complaint - if recognized that the processing of personal data violates the provisions of the GDPR or other provisions on the protection of personal data, the data subject may file a complaint to the President of the Office for Personal Data Protection.

8.2. Proposal on the exercise of the rights of data subjects, you can submit:

8.2.1. in writing to the following address: Trackimo CEE sp. o.o. , ul. Tytusa Chałubińskiego 9/2 (02-004 Warsaw) ;;

8.2.2. by e-mail to the following address: [contact@trackimo.eu](mailto:contact@trackimo.eu)

8.3. The application should, if possible, precisely indicate what the request is for, i.e. in particular:

8.3.1. what permission the person submitting the application wants to use (eg the right to receive a copy of the data, the right to delete the data, etc.),

8.3.2. what processing the request concerns (eg using a specific service, activity on a specific website, receiving a newsletter containing commercial information to a specific email address, etc.),

8.3.3. what processing purposes the request is for (marketing goals, analytical goals, etc.)

8.4. If the Administrator can not determine the content of the request or identify the person submitting the application in oparciu for the submitted application will ask the applicant for additional information.

8.5. A response to applications will be given within one month of receipt. If it is necessary to extend this deadline, the Administrator will inform the applicant about the reasons for such extension.8.6. The answer will be given to the e-mail address from which the application was sent, and in the case of letters sent by regular mail to the address provided by the applicant, unless the content of the letter indicates the desire to receive feedback to the e-mail address (in this case, specify e-mail address) .

## 9. DATA RECIPIENTS

9.1. In connection with the provision of services, personal data will be disclosed to external entities, including in particular suppliers responsible for the operation of IT systems, entities such as banks and payment operators, entities providing accounting, legal, audit, consulting, courier (in connection with the implementation of the contract) , marketing agencies (in the field of marketing services) and entities associated with the Administrator.

9.2. If the User's consent is obtained, his data may also be made available to other entities for their own purposes, including marketing purposes.

9.3. The Administrator reserves the right to disclose selected information about the User to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with the applicable law.

## 10. TRANSMISSION OF DATA OUTSIDE THE EEA

10.1. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Administrator transfers personal data outside the EEA only when it is necessary and with an adequate level of protection, primarily through:

10.1.1. cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued;

10.1.2. use of standard contractual clauses issued by the European Commission,

10.1.3. applying binding corporate rules, approved by the competent supervisory authority,

10.1.4. in the event of data transfer to the USA - cooperation with entities participating in the Privacy Shield program, approved by the decision of the European Commission.

10.2. The administrator always informs about the intention to transfer personal data outside the EEA at the stage of collecting them.

## 11. SECURITY OF PERSONAL DATA

11.1. The administrator conducts risk analysis on an ongoing basis to ensure that personal data is processed in a secure manner - ensuring, above all, that only authorized persons have access to the data and only to the extent that it is necessary due to the tasks performed by them. . The administrator makes sure that all operations on personal data are recorded and made only by authorized employees and associates.

11.2. The Administrator undertakes all necessary actions, so that its subcontractors and other cooperating entities would guarantee that appropriate security measures will be applied whenever they process personal data at the request of the Administrator.

## 12. CONTACT DETAILS

12.1. Contact with the Administrator is possible via the e-mail address [contact@trackimo.eu](mailto:contact@trackimo.eu). or mailing address Trackimo CEE sp. o.o., ul. Tytusa Chałubińskiego 9/2 (02-004 Warsaw) .

13. CHANGING THE PRIVACY POLICY 13.1. The policy is verified on an ongoing basis and updated if necessary.