

PRIVACY POLICY

What can you find in this document?

In the Privacy Policy, we have prepared information about the rules on how we process your personal data, including **the rights** granted to you by data protection legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council 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 repealing Directive 95/46/EC (General Data Protection Regulation). You can find the text of the GDPR [here](#).

I. THE CONTROLLER

1. We, i.e. Avallon sp. z o.o. with its registered office in Łódź, ul. Kościuszki 17, 90-418 Łódź, have the status of the controller within the meaning of the provisions of **the General Data Protection Regulation** (hereinafter: the "**GDPR**").

In the further part of the Privacy Policy we write about ourselves in the first person or refer to ourselves as the "Controller", "Avallon" or "We".

2. We operate on the basis of entry in the Register of Entrepreneurs of the National Court Register, the registration files are kept by the District Court for Łódź-Śródmieście in Łódź, XX Commercial Division of the National Court Register under KRS No. 0000032090, NIP 7251817995, REGON 472909383.
3. You can contact us:
by post: ul. Kościuszki 17, 90-418 Łódź;
by e-mail to: rodo@avallon.pl.

Protection of personal data

1. We process all personal data that we collect about you during your use of the website, as controller, in accordance with the GDPR.
2. We use the technical measures required by current data protection legislation to prevent unauthorised persons from obtaining and modifying personal data sent electronically, i.e. within our website.

II. OUR ACTIVITIES IN WHICH WE PROCESS YOUR PERSONAL DATA

1. Contacting us by telephone or email

If you contact us, please note the following:

Why do we need your data, i.e. for what purpose do we process it?

- 1) responding to your message and resolving the issue you have raised;
- 2) for marketing purposes, consisting in conducting analytical activities related to our services, including those leading to the learning of your preferences, as well as the adaptation of the content of the website to your interests and improving the functionality of the website, the services offered by us and the survey of opinions;
- 3) for internal administrative purposes, in connection with which your data may also be transferred to companies affiliated with Avallon.

Do you have to provide us with your data?

Providing your data is voluntary. However, without your contact details we may not be able to resolve the matter you have submitted. It will also not be possible for you to receive commercial information on your telephone number or e-mail address without the relevant consent.

On what legal basis do we process your data?

The legal basis for processing your data is:

- 1) Article 6(1)(f) of the GDPR (necessity of processing for the purposes arising from our legitimate interests) – our legitimate interests are: the right to make contact with you, to resolve the matter you have raised, to adapt the answer to the question you have asked to your situation and to market our services, consisting of analytical activities leading to the knowledge of your preferences, to adapt the content of the website and to improve the functionality of the website and the services offered by the Controller, as well as opinion surveys, and internal administrative purposes;
- 2) if you agree to receive marketing messages at your e-mail address or telephone number, the legal basis will also be Article 10 of the Act on Electronic Provision of Services and Article 172 of the Telecommunications Act.

Remember that you can always withdraw your consent. If you wish to do so, please contact us.

Who will we transfer your data to?

- 1) providers of software for running the website,
- 2) providers of tools for traffic analysis and marketing on our website,
- 3) entities hosting (storing) the website or personal data for us,
- 4) marketing agencies,
- 5) entities dealing with delivery of mail, i.e. courier companies and Poczta Polska.

How long will we process your data?

For the time:

- 1) it takes to get in touch with you, to resolve the issue you have raised, to answer the question you have asked. Depending on its type, also for the time necessary to prove that we did it, i.e. the period of limitation of claims;
- 2) marketing activities are carried out by us or related to Avallon's internal purposes or until you object to further data processing or withdraw your consent to marketing communications. Your withdrawal of consent does not affect the lawfulness of processing prior to withdrawal of consent.

Will we transfer your personal data outside the European Economic Area?

In the event that the transfer of your personal data outside the European Economic Area is necessary, it will take place on the legal mechanism provided for in the GDPR.

2. Avallon on LinkedIn

Our page on LinkedIn is operated by LinkedIn Ireland Unlimited Company, based at Wilton Place, Dublin 2, Ireland ("**LinkedIn**"). When you visit our page on LinkedIn, LinkedIn processes your personal data in accordance with its privacy policy, which you can find [here](#).

We process the following personal data:

- 1) your LinkedIn username and comments published on our page on LinkedIn and messages sent to us via the page on LinkedIn;
- 2) activity on our LinkedIn profile that we monitor using the Page Insights service, e.g. visits to our page, extent of giving;
- 3) other information that is necessary to service our Visitors' requests or to uniquely identify Visitors in our systems

3. Avallon on YouTube

If you visit us on YouTube, Google Ireland Limited, based at Gordon House, Barrow Street, Dublin 4, Ireland as the operator of YouTube collects and processes personal data to the extent described in its Privacy Policy.

YouTube's privacy policy can be found [here](#).

We use statistical information (including visits to our site, extent of sharing, average playback time of videos, information about the region our visitors come from, gender of the viewer, and others) about

the use of our YouTube channel, which YouTube provides in anonymised form in its "Analytics" service. We do not have access to the profiles of individual users or the results of their queries.

We process the following personal data:

- 1) your YouTube username and comments published on our channel on YouTube;
- 2) users' activity on our YouTube channel, which we monitor using YouTube Analytics, e.g. visits to our website, extent of sharing, average playback time of videos, information about the country and city our visitors are from and statistics about the gender of our Visitors;
- 3) other information that is necessary to serve our Visitors' requests or to uniquely identify visitors on our systems.

4. Additional information

Why do we need your data, i.e. for what purpose do we process it?

Your data is processed for the following purposes:

- 1) communicating with us via the tools provided by social media services;
- 2) To carry out requests (demands) made to us;
- 3) obtain statistical information about the reach of the fanpage, website or profile in social media;
- 4) conduct surveys, market analyses or similar events;
- 5) handle disputes by defending against legal claims or litigation.

Do you have to give us your data?

Providing your personal data is voluntary. However, without providing your contact details, we may not be able to resolve the matter you have submitted. It will also not be possible for you to receive commercial information on your telephone number or e-mail address without your consent.

Why do we need your data, i.e. for what purpose do we process it?

The legal basis for data processing is:

- 1) Article 6(1)(f) of the GDPR (necessity of the processing for purposes arising from our legitimate interests) – our legitimate interest lies in the right to communicate and respond to your messages or queries, analyse the reach and use of social media channels to create relevant communications and optimise marketing activities;
- 2) if you additionally give your consent to receive marketing messages to your e-mail address, telephone number or during telephone conversations, the legal basis will also be Article 10 of the Act on providing services by electronic means and Article 172 of the Telecommunications Act.

Remember that you can always withdraw your consent. If you wish to do so, please contact us.

Who will we pass your data to?

- 1) providers of software for running the Site,
- 2) providers of tools for traffic analysis and marketing on our Website,
- 3) entities hosting (storing) the Site or personal data for us,
- 4) marketing agencies,
- 5) entities dealing with delivery of mail, i.e. courier companies and Poczta Polska.

How long will we process your data?

For the time:

- 1) the time it takes to get in touch with you, to resolve the issue you have raised, to answer the question you have asked. Depending on its type, also for the time necessary to prove that we did it, i.e. the period of limitation of claims;

- 2) for marketing activities carried out by us or related to Avallon's internal purposes or until you object to further data processing or revoke your consent to marketing communications. Your withdrawal of consent does not affect the lawfulness of processing prior to withdrawal of consent.

Will we transfer your personal data outside the European Economic Area?

In the event that the transfer of your personal data outside the European Economic Area is necessary, this will be done on the legal mechanism provided for in the GDPR.

Joint controllership with LinkedIn

We use statistical information (visits to our website, extent of contribution, information about the country and city from which our visitors come, and statistics about our visitors' professional affiliations) about the use of our company page on LinkedIn, which LinkedIn makes available in anonymised form in LinkedIn's "Page Insights" service. We do not have access to the profiles of individual users or the results of their queries.

Accordingly, we and LinkedIn together have the status of "joint controllers" within the meaning of the GDPR and have therefore entered into a joint controllership agreement in order to comply with the legal requirements. The joint controllership agreement is available [here](#). There you will find all information relevant to you as a data subject, in particular regarding the exercise of your rights under the General Data Protection Regulation.

Apart from the processing of personal data mentioned in the Privacy Policy, we do not have any influence on the processing of personal data in connection with your use of our company page on LinkedIn.

III. RIGHTS CONCERNING YOUR PERSONAL DATA

1. We process your personal data, therefore:
 - 1) you have the right to access your personal data,
 - 2) you can make rectifications,
 - 3) you can exercise your right to personal data portability,
 - 4) you can request erasure of your personal data where this is allowed by the GDPR,
 - 5) you have the right to restrict processing, to the extent specified in the GDPR.
2. If you want to exercise your rights or learn more about them get in touch with us. You will find our contact details at the beginning of the Policy.

Right to object

1. Once you have provided us with your personal data, or if we collect it ourselves, you can exercise your right to object. You have this in two situations where we process your personal data:
 - 1) for direct marketing purposes; you do not have to justify such an objection;
 - 2) on the basis of our other legitimate interests; such an objection needs to be justified by your particular situation. Write us why we should not process your data.
2. If you want to exercise your right to object contact us. You will find our contact details at the beginning of the Policy.

Rights under joint controllership

Where personal data is processed through the "Page Insights" service offered by LinkedIn, LinkedIn has assumed primary responsibility. This applies to the processing of "Page Insights" statistics and the enforcement of data subjects' rights. Therefore, please contact LinkedIn directly with regard to any obligations under the GDPR with regard to the processing of "Page Insights" data. Although you may enforce your rights against us, we will forward the enquiries we receive in this regard to LinkedIn.

Complaint to the President of the Personal Data Protection Office

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State where you reside or where the alleged infringement took place, if you believe that the processing of personal data concerning you is in breach of the General Data Protection Regulation.

The supervisory authority to which a complaint may be lodged, which is competent for the country of the Controller's registered office, i.e. the Republic of Poland, is the President of the Personal Data Protection Office, and its website is available at this address: <https://uodo.gov.pl/>.

IV. COOKIES

Entry to the Website

When you visit the website, we process the information contained in cookies. Cookies are stored on your terminal equipment (e.g. computer, tablet, smartphone) and the information they contain is then accessed. These activities take place according to the principles described below.

What are cookies and why do we use them?

1. The website uses cookies, which are small text files stored on your terminal equipment (e.g. computer, tablet, smartphone). Cookies can be read by the website. Want to know more about cookies? Have a look at [Wikipedia at this link](#).
2. We store cookies on your computer, phone or tablet and access the information contained in them for the purposes of:
 - 1) ensuring the proper functioning of the Site, including maintaining your session,
 - 2) statistical and analytical purposes, in particular to enable us to analyse how you use the website.
3. In the case described in paragraph 2, point 2, the processing of your personal data may take place:
 - 1) their processing is necessary for the purposes of our legitimate interest (Article 6(1)(f) of the GDPR), which is to ensure your safety when using the website, to carry out marketing of our services, which you can learn about from our website, and to collect statistical data about how you use our website in order to optimise its performance;
 - 2) we have set out your rights in relation to this processing in Part III of the Policy;
 - 3) remember that you can contact us at any time and object to the processing of your personal data – such objection does not need to be justified;
 - 4) we will transfer your personal data to providers of analytical tools;
 - 5) we will retain it for the duration of these statistical and analytical activities or until you object to further processing for statistical or analytical purposes;
 - 6) transfers of personal data outside the European Economic Area will be made when the conditions are fulfilled to allow this. We will inform you if this occurs;
 - 7) the provision of this personal data is voluntary, and failure to do so, e.g. through the use of appropriate blocking software, does not entail any negative consequences.

Types of cookies

There are several types of cookies on the website:

- 1) session cookies, which remain in the memory of your web browser until you switch it off,
- 2) temporary, which remain in the memory of your web browser until a predetermined period of time passes (maximum 2 years), bearing in mind that you can delete such files earlier on your own,
- 3) external, which come, inter alia, from providers of analytical tools for the website.

How to block cookies

1. You can configure your web browser to prevent cookies from being stored on your computer, phone or tablet. You can also use appropriate browser extensions or programs to do this.

2. you will find information on how to block cookies in the most popular web browsers at these links:
 - 1) Firefox: <https://support.mozilla.org/pl/kb/blokowanie-ciasteczek>
 - 2) Opera: <https://help.opera.com/pl/latest/web-preferences/>
 - 3) Edge: <https://support.microsoft.com/pl-pl/microsoft-edge/usuwanie-plików-cookie-w-przeglądarce-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
 - 4) Internet Explorer: <https://support.microsoft.com/pl-pl/topic/usuwanie-plików-cookie-i-zarządzanie-nimi-168dab11-0753-043d-7c16-ed5947fc64d>
 - 5) Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=pl>
 - 6) Safari: <https://support.apple.com/pl-pl/HT201265>

How to delete cookies

1. You can delete cookies once they have been stored by us. To do this, you can use: the relevant functions of your web browser, programs for this purpose or the relevant tools available within your operating system.
2. At these links you will find information on how to delete cookies in the most popular web browsers:
 - 1) Firefox: <https://support.mozilla.org/pl/kb/usuwanie-ciasteczek>,
 - 2) Opera: <https://help.opera.com/pl/latest/web-preferences/#cookies>,
 - 3) Edge: <https://support.microsoft.com/pl-pl/microsoft-edge/usuwanie-plik%C3%B3w-cookie-w-przegl%C4%85darce-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
 - 4) Internet Explorer: <http://support.microsoft.com/kb/278835/pl>
 - 5) Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
 - 6) Safari: <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>
 - 7) Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=pl>

Impact of changing your browser settings on the use of the website

Changing the settings of your web browser to one that prevents or restricts the storage of cookies may result in restrictions on the functionality of the website. Deleting cookies while using the website may have similar effects. This means that some of our services may not be available without cookies.

External (third-party) cookies

1. The cookies placed on your computer, phone or tablet may come from third party service providers. You can block them or delete them yourself from your equipment. These cookies are stored on your equipment for varying lengths of time, depending on the file in question (at most for the duration of the relevant session).
2. The website contains cookies provided by:
 - 1) Google Ireland Limited as part of the Google Analytics and Google Tag Manager services. These services help us analyse traffic on the Website. They provide us with statistics and analytical data about how you and other users use the Site. You can block Google Analytics using a browser add-on provided by Google: <https://tools.google.com/dlpage/gaoptout?hl=pl>;
 - 2) LinkedIn Ireland Unlimited Company as part of the LinkedIn Insight Tag service. This service allows us to optimise marketing activities, analyse website traffic and information about the audience of our content.
3. Transfers of personal data outside the European Economic Area will be made when the conditions are met to allow this to happen. We will inform you if this occurs.