

Privacy policy

This Privacy Policy sets out the principles governing the processing of your personal data by ATT sp. z o.o. with the seat in Kraków (ul. Albatrosów 16c, 30-218 Kraków, Poland).

1. Controller

The controller of your personal data is ATT sp. z o.o. with the seat in Kraków, Albatrosów 16c, 30-218 Kraków, entered into the Business Register of the National Court Register, kept by the District Court for Kraków-Śródmieście in Kraków, XI Department for Commercial Matters of the National Court Register, with number 0000218527, NIP 6792822085, REGON 356872187, with the share capital of 50,000.00 zł (**Controller**).

The Controller can be contacted at the following email address: privacy@att.eu or by mail to the Controller's seat address stated above.

2. Legal basis and purpose of personal data processing

The Controller shall process personal data in accordance with the relevant legislation, in particular 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, GDPR).

Depending on the situation, the Controller processes your personal data for the following purposes and on the basis of the following provisions of GDPR:

1. for the purpose of concluding and performing the contract concluded with you or, at your request, for the purpose of taking action aimed at concluding the contract (eg sending an offer) – on the basis of Article 6(1)(b) GDPR – no longer than until the expiry of claims in connection with the contract;
2. in order to pursue the Controller's legitimate interests, ie:
 - o to promote and advertise products and services of the Controller, of the entities belonging to the Controller's capital group or third parties that are directly related to the subject of the contract concluded between you and the Controller,
 - o to assert any claims of the Controller,
 - o to archive for the purpose of protecting the Controller's legal interest,
 - o to ensure your safety in connection with the recording of your image using CCTV cameras while on the Controller's premises,
 - o to respond to your enquiries not related to the contract concluded with the Controller,
 - o to ensure security and proper functioning of the Controller's website, including through the use of cookies – more information about cookies can be found in point 7 of this Privacy Policy.

Processing for the purposes of the legitimate interests of the Controller takes place on the basis of Article 6(1)(f) of GDPR, no longer than until the purposes indicated above have been fulfilled, with the exception of the processing of personal data for the promotion and advertising of products and services – then no longer than until you object.

3. in order to fulfil the obligations imposed on the Controller by the relevant regulations, eg tax law, accounting act – on the basis of Article 6(1)(c) of GDPR – no longer than the statute of limitations for public law claims;
4. to send out the newsletter you have ordered – on the basis of Article 6(1)(a) GDPR – no longer than until you withdraw your consent;
5. to promote and advertise products and services of entities cooperating with the Controller, if they do not fall within the scope specified in point 2 above (in the case of persons who have given the relevant consent and only to the extent specified in such consent) – on the basis of art. 6(1)(a) GDPR – not longer than until withdrawal of consent.

3. Rights of persons whose personal data are processed

Providing personal data to the Controller is **voluntary**, but necessary for the purposes stated above in this Privacy Policy. The fulfilment of these purposes will not be possible in case of your refusal to provide personal data.

As the Controller processes your personal data, you have the following rights:

1. the right to access your personal data;
2. the right to have your personal data rectified if inaccurate and completed if incomplete;
3. The right to request the erasure of personal data (“the right to be forgotten”) in any of the following cases:
 - o where you have withdrawn the consent on which the processing is based and there is no other legal basis for the processing;
 - o when your personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - o where your personal data have been unlawfully processed;
 - o where you object to the processing and there are no overriding legitimate grounds for the processing;
 - o where the data was collected in connection with the provision of information society services as stated in Article 8(1) of GDPR.
 - o where personal data must be erased to comply with a legal obligation under European Union or Polish law.

However, the Controller will not have to delete your personal data to the extent that the processing is necessary: (i) to exercise the right to freedom of expression and information; (ii) to comply with a legal obligation requiring the processing under European Union or Polish law or to perform a task carried out in the public interest; (iii) to establish, exercise or defend claims; (iv) for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes, insofar as the right to request erasure is likely to render impossible or seriously impede the purposes of such processing.

4. the right to restrict data processing in cases where:
 - you challenge the correctness of the personal data – for a period allowing the Controller to verify the correctness of the data;
 - the processing is unlawful and you object to the erasure of your personal data, requesting instead that its use be restricted;
 - the controller no longer needs your personal data for the purposes of the processing, but you need them to establish, assert or defend your claims;
 - you have raised an objection, until such time as we determine whether the Controller’s legitimate grounds for doing so override the grounds for your objection.
5. the right to object to processing on grounds relating to your particular situation – to processing carried out in pursuit of the legitimate interests of the Controller.
6. the right to withdraw consent – at any time in relation to situations where your personal data is processed on the basis of your consent. The withdrawal of consent shall not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.
7. the right to data portability – where your data are processed on the basis of consent or on the basis of a contract and the processing is carried out by automated means, you have the right to obtain from the Controller, in a structured, commonly used and machine-readable format, your personal data which you provided to the Controller. You also have the right to request that this personal data be sent to another controller, insofar as this is technically possible.
8. the right to lodge a complaint against the processing of personal data by the Controller to the competent supervisory authority (the President of the Office for Personal Data Protection) if you believe that the processing is carried out in breach of GDPR.

4. Recipients of personal data

The Controller may share your personal data with the following recipients:

1. entities belonging to the Controller’s capital group,
2. entities cooperating with the Controller for the purposes related to the performance of contracts concluded with you, including, among others, suppliers, subcontractors, agents,
3. entities providing IT services,

4. entities providing marketing services,
5. entities providing accounting, legal and debt recovery services,
6. entities providing security services for persons and property to the Controller.

In some cases personal data may be transferred outside the EEA, which is generally necessary to take action prior to entering into a contract with you or in connection with the ongoing performance of a contract already concluded with you. We make reasonable efforts to ensure that recipients of your data apply the necessary security standards. However, due to the global activities of the Controller, sometimes some data and only to the extent necessary is transferred to countries outside the EEA, which do not guarantee legal standards fully compliant with

GDPR principles. All other transfers of data outside the EEA may be related to the use of the Controller's websites or profiles on social networks, and in this respect your personal data is processed in compliance with the necessary legal standards, ie in compliance with the EU USA Privacy Shield agreement or by the use of standard contractual clauses in line with Commission Decision 2010/87/EU on standard contractual clauses for the transfer of personal data to processors established in third countries under Directive 95/46/EC of the European Parliament and of the Council (OJ L 39 p 5, 12.02.2010), issued on 5 February 2010.

5. Period of retention of personal data

The Controller will retain your personal data for no longer than necessary to fulfil the purposes stated above in this Privacy Policy and to comply with applicable law (or until you object in the case of processing of personal data for direct marketing purposes, or withdraw your consent in this case, your personal data may be processed only if there is another legal basis for processing your data, eg an obligation imposed by law on the Controller, for the fulfilment of which the processing of your personal data is necessary). In any case, the period of processing of your personal data will not exceed 10 years.

6. Links to external websites

The Controller's website may contain links or other references leading to external websites or social networking services (eg Youtube) and the Controller's profiles on such portals that are not owned by the Controller. The Controller has no influence on and is not responsible for the manner in which personal data is processed by third-party owners of external portals, but with regard to the Controller's profiles within such portals the Privacy Policy shall apply accordingly. The privacy and cookie policy published by the operators of external websites will also apply to the person using the redirection. We encourage you to read these policies.

The Controller is not responsible for the personal data processing policies of other entities and organisations, social media platform providers (Youtube), operating systems, portals, services, including any data that is disclosed to other entities when using social media features.

The Controller will be able to access some of the users' data such as age, gender, location, activity on external websites within the Controller's profile, which will not enable the identification of users. This data may be used in order to direct advertising, which is the Controller's legitimate aim.

The acceptance or non-acceptance of the use of the above data within the framework of the above portals can be made in the account settings of the social media platforms, eg in the case of Youtube in the privacy settings after logging in to your Google account.

7. Cookies

The Controller uses cookies which are IT data, in particular small text files saved and stored on the devices through which you use the Controller's website. The cookies used by the Controller are safe for your devices. In particular, it is not possible for viruses or other unwanted software or malware to enter your device via this route. These cookies allow us to identify the software used by you and to adapt the website individually. Cookies usually contain the name of the domain from which they originate, the storage time on your device and the assigned value.

The Controller uses two types of cookies:

- session cookies: these are stored on your device and remain there until the session of a given browser ends. The stored information is then permanently deleted from the memory of your device.
- permanent cookies: these are stored on your device and remain there until you delete them. Ending the session of a given browser or switching off the device does not cause them to be deleted.

You have the possibility to limit or disable access of cookies to your device. In this case, using the Controller's website will be possible, however, some of its functions, which require access to cookies, may not be available.

The Controller uses his own cookies for the correct configuration and full functionality of his website, in particular to:

1. adapt the content of its website to your preferences and to optimise its use,
2. remember which consents you have given, in particular: consent to send commercial information, consent to direct marketing,
3. log in and remember information about the logging session,
4. save data in the form being filled in (automatic form filling),
5. recognise your device and display the website accordingly, its functions and the customised information provided,
6. remember your settings and personalisation of the interface, eg with respect to the language or region you have chosen,
7. remember the history of pages visited on the site in order to recommend content,
8. remember the font size, the look of a web page, etc,
9. correctly operate the affiliate programme, enabling in particular verification of the sources of redirection to the Controller's website,
10. analyse and research, as well as audit visitor statistics, in particular to create anonymous statistics that help us understand how you use the Controller's website, which enables us to improve its structure and content.

The Controller also uses external cookies provided by Google Inc. with the seat in the USA, to collect general and anonymous statistical data via Google Analytics analytical tools. To block the collection of the above data by Google Analytics, you can, among other things, install a plug-in to your browser available at <https://tools.google.com/dlpage/gaoptout>

Storage period for cookies

The storage period for cookies is 12 months.

You can change your cookie settings yourself and at any time, specifying the conditions under which they are stored and accessed by your device. You can change the settings referred to in the previous sentence via the settings of your browser or via the configuration of the service. These settings can be changed, in particular, in such a way as to block the automatic handling of cookies in the settings of your web browser or inform on their placement on your device each time. Detailed information on the possibility and methods of using cookies is available in the software (web browser) settings.

- Google Chrome browser:
<https://policies.google.com/technologies/managing?hl=pl>
- Firefox browser:
<https://support.mozilla.org/pl/kb/wlaczanie-i-wylaczanie-ciasteczek-sledzacych>
- Internet Explorer browser:
<https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

The user can delete cookies at any time using the functions available in the web browser used. Restricting the use of cookies may affect some of the functionalities available on the website.

When you visit the website for the first time, you can agree to our use of cookies.

If you want us to stop using cookies, you can delete cookies from your device or revoke your consent via privacy@att.eu