

# Privacy **Policy**

We make every effort to protect your personal data and your right to privacy. This Privacy Policy regulates the practices we observe at [www.onwelo.com](http://www.onwelo.com). Please read it carefully, as it will help you take informed decisions.

## PERSONAL DATA CONTROLLER IDENTIFICATION AND CONTACT DETAILS

As defined by the GDPR\*, your personal data, related to your use of our website, is controlled by Onwelo Spółka z o.o., with a seat in Poland, Warsaw (00-838 Warsaw), ul. Prosta 67 (hereinafter referred to as "Onwelo").

If you have any doubts or queries regarding our policy as it relates to your personal data and rights:

- a. contact us via our contact form or
- b. send a message to our Data Protection Officer at: [personaldata@onwelo.com](mailto:personaldata@onwelo.com).

## WHAT DATA DO WE PROCESS, HOW, AND ON WHAT LEGAL BASIS?

The data we collect depend on how you interact with us and our website, the choices you make, and the features you use. Below, we have grouped them according to the functions and services you can access via our site:

## DATA COLLECTED AUTOMATICALLY

<b>System logs</b>	<p>When you visit our site, your browser automatically shares essential technical data that we need to be able to display the website and ensure its security and stability. These include: the name of the website from which you have accessed our site, your browser type, version, and language, the IP address of your device, its operating system and user interface, the date and duration of your visit, the URL address of the pages that you browse and the files you download from our site.</p> <p>System logs help us manage our website, improve your user experience, and analyze site security and stability.</p> <p>System logs are processed based on Onwelo's legitimate interests (art. 6.1.f. of the GDPR), i.e. for the processing purposes indicated above, as well as to establish, seek redress for, or ensure defense against any potential claims.</p> <p>System logs are automatically deleted after no more than 3 years.</p>
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## **Cookies and similar technologies**

Our website uses cookies and other similar technologies. A cookie is a short text file sent to your desktop or mobile browser by a website when you view it. Cookies contain information about the time they were saved on the end device, the domain name, and a unique number (cookie ID) that identifies the browser from which you connect to the website. Cookies allow websites to remember data related to your visit and may provide information such as your geographical location, the way you have reached the site, how much time you have spent on its different subpages, and the type of device you use (desktop/mobile, operating system).

### **Cookie data are processed in order to:**

- ★ customize site content in accordance with user preferences and enhance the user experience (e.g. by displaying a version of the site specifically optimized for the device you are using),
- ★ create statistics to help us understand how users interact with our website so that we can improve its features and content,
- ★ display ads that better match user interests.

If you need more information about the cookies we use at Onwelo, including third-party cookies, please read our [Cookie Policy](#).

### **The legal basis for the processing of cookie data depends on cookie type:**

- ★ essential cookies are processed based on Onwelo's legitimate interests (art. 6.1.f of the GDPR), i.e. to ensure the proper functioning of the website,
- ★ analytics, functional, and marketing cookies are processed based on your consent; you can accept or reject them via the cookie banner on our website. You can withdraw your consent at any time by changing your browser settings – more about this in our [Cookie Policy](#).

How long cookie data are retained depends on their type. Session cookies are deleted immediately after you close the browser window; other cookie types come with a specific expiry date. In addition, you can also manually disable or delete cookies in your web browser (for more details, go to our [Cookie Policy](#)).

## THE INFORMATION YOU SHARE

<p><b>Contact forms</b></p>	<p>Our website allows you to ask questions about our products and services via a dedicated contact form. In order to use it, you must provide your personal contact details, such as your first name, last name, and e-mail address, so that we can get back to you and answer your query. In the body of the message, you can also share other data to make it easier for us to contact you or process your query.</p> <p><b>Contact form data will be processed in order to:</b></p> <ul style="list-style-type: none"><li>★ identify the sender and handle the query sent via the contact form,</li><li>★ market our products and services, if you agree to receive information of this kind (more details about marketing can be found in a separate paragraph below).</li></ul> <p><b>Contact form data will be processed based on:</b></p> <ul style="list-style-type: none"><li>★ Onwelo's legitimate interests (art. 6.1.f. of the GDPR), i.e to troubleshoot the issue reported in the form, as well as to establish, seek redress for, and ensure defense against any potential claims,</li><li>★ your informed consent to receive marketing content related to our products and services, including from other Onwelo Spółka z o.o. companies (art. 6.1.b. of the GDPR), which you can withdraw at any time.</li></ul> <p>Your data will be processed for a period necessary to pursue our legitimate interests or until you effectively object to its processing, but in any case, only until any potential claims are barred by the statute of limitations. If the data is processed based on your informed consent to receive commercial and marketing communications, it will be processed until the consent is withdrawn.</p>
<p><b>Marketing of our products and services</b></p>	<p>If you have consented to receive commercial information, we will use the data provided in the contact form for that purpose.</p> <p>Accordingly, we will process the data for the purposes of sending you commercial information, including direct marketing communications from other companies in the Onwelo Spółka z o.o. group, in the form of marketing e-mails (including information, commercial and promotional content).</p> <p>The data will be processed based on your informed consent (art. 6.1.b of the GDPR) to electronic communications of this sort. You can opt out of receiving our messages at any time by clicking the deactivation link provided in the e-mail.</p> <p>Your data will be processed until you opt out of marketing e-mails (i.e until you withdraw your consent or object to its processing).</p>

## Profiling

Based on automatic cookie data, we may create a profile of your interests and preferences for the purposes of the direct marketing of our products and services, as well as to personalize your marketing content

Profiling allows us to display customized marketing content for our products and services, also on the websites of other unrelated entities, via the advertising network of Google, Facebook, LinkedIn and Twitter. To do so, we need to process unique IDs (via cookies), visit duration, and website browsing history. For the purposes of analysis, profiling and personalization, we rely on the aid of external analytics (Google Analytics, Google Tag Manager) and advertising tools (Google Ads, Facebook Pixel, LinkedIn Insight Tag).

Profiling is designed to match the marketing content and information that you see to your interests. Your data will not be processed for the purposes of automatic decision-making. The profiling we engage in does not result in any decisions that may have any legal effects for you or affect you in any other significant way.

### **Your data will be processed based on:**

- ★ Onwelo's legitimate interests (art. 6.1.f. of the GDPR), such as direct marketing, including profiling,
- ★ your consent to cookie files; you can accept or reject them via the cookie banner on our website. You can withdraw your consent at any time by changing your browser settings – more about this in our [Cookie Policy](#).

Your data will be processed until the expiry date of specific cookies or until you opt out of personalized content, i.e. withdraw your consent or object to profiling by rejecting, deleting or blocking cookies in your browser settings.

## Phone or e-mail contact (via phone numbers and e-mail addresses listed on the website)

If you contact us by phone or e-mail using any of the phone numbers or e-mail addresses listed on our website, we will collect your personal data, e.g. your first name, last name, phone number, and e-mail address, for the purposes of processing your request.

The data you share with us on the phone or in the e-mail will be processed for the purposes of communication and problem-solving related to your request, as expressed through those channels.

In this case, the data will be processed based on Onwelo's legitimate interests (art. 6.1.f. of the GDPR), i.e. to troubleshoot the reported issue and/or conduct correspondence related to our business operations, as well as to establish, seek redress for, and ensure defense against any potential claims.

Your data will be processed for a period necessary to pursue our legitimate interests or until you effectively object to its processing, but in any case, only until any potential claims are barred by the statute of limitations.

### **Interactions through our social media profiles**

Onwelo has profiles on social media platforms such as Facebook, LinkedIn, Xing, Instagram, Twitter, TikTok, and may process any data you leave behind when visiting them (including comments, likes, internet IDs). We get your data when you start following our profiles or interact with us in any other way.

#### **Your data will be processed:**

- ★ to enable activity on our profiles,
- ★ answer questions asked via social media,
- ★ promoting various Onwelo events and services through social media posts,
- ★ for the purposes of analysis and statistics.

Remember that social media independently collect personal data (related to user profiles), so you need to read the privacy policy of any platform carefully before you create a user account.

Your data is processed based on Onwelo's legitimate interests (art. 6.1.f. of the GDPR), i.e. to promote its brand and services.

The data will be processed for a period necessary to pursue our legitimate interests or until you effectively object to its processing. Remember that you can always delete your comments under our posts, unfollow us, or delete your social media account.

### **Establishing, seeking redress, and defense against claims**

If you use our website in an unlawful way or sustain any damage related to using our website, there may be a need for us to carry out establish, seek redress for, or ensure defense against potential claims.

To this end, we may process information provided via electronic forms, system logs, site use data, and other data necessary to settle any potential claims.

In such cases, your data will be processed based on Onwelo's legitimate interests (art. 6.1.f. of the GDPR), i.e. to establish, seek redress for, or ensure defense against any potential claims related to our platform.

Your data will be processed until any potential are barred by the statute of limitations.

## WHO DO WE SHARE YOUR DATA WITH?

The personal data we process in relation to your use of our website may be shared with:

1. Authorized public authorities, e.g. police, prosecutor's office, courts, and personal data protection supervisory authorities in order to meet our legal obligations.
2. Other Onwelo Sp. z o. o. companies, provided you give your informed consent.
3. Our suppliers and service providers in the area of:
  - ★ statistical and analytics services (e.g. Google Analytics, Google Tag Manager),
  - ★ online marketing systems (e.g. Google Ads, Facebook Pixel, LinkedIn Insight Tag),
  - ★ IT services and infrastructure (e.g. Microsoft Corporation, hosting companies),
  - ★ marketing,
  - ★ legal advice.

Some of our providers may be based outside the European Economic Area (EEA), which means your data may be processed outside its territory. If your data is shared with a third country where data protection levels have not been confirmed by a EC decision, Onwelo will take special measures, such as including a standard data protection clause adopted by the European Commission or a supervisory authority (art. 46.2 (c) and (d) of the GDPR). The detailed terms and conditions that regulate the sharing of personal data with third countries can be found here:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

## SOCIAL MEDIA AND LINKS TO OTHER BUSINESSES

Our website contains links that may redirect you to websites owned by other businesses; if you want to use them, you should read their privacy policies.

Our website also has integrated social media plug-ins that can redirect you to our profiles on:

- ★ Facebook Inc.
- ★ LinkedIn Corporation
- ★ Twitter Inc.
- ★ Instagram LLC
- ★ XING AG
- ★ TikTok

When you click the plug-in, your browser will directly connect to the server of the social media site in question. If you are signed in to any of these platforms, their servers will receive information about your visit to our website, which may be assigned to your account. If you do not want to share this data, sign out of the social platform in question before you click the plug-in. The purposes and scope of data processing and use, as well as your rights and available privacy settings, are laid down in the privacy policies of the social media platforms in question.

## WHAT ARE YOUR RIGHTS WITH REGARD TO THE PROCESSING OF YOUR PERSONAL DATA?

In accordance with the GDPR, you have the right to:

1. access and get a copy of your personal data (art. 15),
2. rectify (correct) your personal data (art. 16),
3. restrict the processing your personal data in circumstances specified in art. 18,
4. erase your personal data under circumstances specified in art. 17.1, with the exceptions laid down in art. 17.3,
5. transmit your personal data, as specified in art. 20,
6. object to the processing of your personal data, in cases specified in art. 21 – you can object to the processing of your personal data, including profiling, at any time if we process your data based on our legitimate interests (e.g. for the purposes of marketing our products and services),
7. withdraw your consent – If we process your data based on your informed consent, you can withdraw your consent; this action will only apply to the future and will not affect any legal data processing before the withdrawal of consent.

You can request to exercise of your rights via e-mail: [personaldata@onwelo.com](mailto:personaldata@onwelo.com).

## SUPERVISORY AUTHORITY

If you think the controller has violated the law while processing your personal data, you may lodge a complaint with a supervisory authority. The supervisory authority depends on your place of permanent or temporary residence. In Poland, the supervisory authority is the President of the Data Protection Office (<https://uodo.gov.pl>).

## PRIVACY POLICY UPDATES

Any changes to this Privacy Policy will go into effect when a new version is published on our website. The current version of the Policy (1.2) applies as of 9 October 2023.

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\* Regulation (EU) 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)



