

Privacy **Policy**

We make every effort to protect your personal data and your right to privacy. This Privacy Policy regulates the practices used on our website located at www.onwelo.com. Please read this policy carefully as it will help you to make informed decisions regarding providing us with your personal data.

IDENTIFICATION AND CONTACT DETAILS OF PERSONAL DATA CONTROLLER

The controller of your personal data – as defined in GDPR* – processed in relation to using our website is Onwelo SA based in Warsaw (01-207 Warszawa), ul. Karolkowa 30 (“Onwelo”).

If you have any questions or doubts related to our policy with regard to your personal data and your rights, please contact us:

- a. via our contact form, or
- b. via our Data Protection Officer by sending an e-mail to: personaldata@onwelo.com.

TYPES OF DATA, PURPOSES, LEGAL BASIS AND MANNER OF PROCESSING

The data collected by us depend on the context of your interaction with us and our website, the choices you make and the functions you use. We have grouped the information as relevant to the individual services and functionalities which you can use via our website:

DATA COLLECTED AUTOMATICALLY

System logs

When you visit our website, your browser automatically provides our server with data which are technically necessary to display the website and ensure its security and stability. That information includes name of the website from which you entered our website, browser type, language and version, your device’s IP address, operating system and UI, time and duration of the visit, and the URL address of browsed sites and files downloaded on our website.

We use data from system logs to manage the website, ensure its ease of use, and analyze the website’s security and stability.

We process data from system logs on the basis of Onwelo’s legitimate interests (Article 6(1)(f) of GDPR) which are the same as the purposes of processing indicated above, and also include the ability to determine, seek compensation of, and defend against, any possible claims.

System logs are stored until they are automatically deleted, no longer than 3 years.

Cookies and similar technologies

Our website uses cookies and similar technologies. Cookies are short text files sent to your browser by a website you are currently visiting. Cookies include the domain name of the website from which their originate, retention time on end device, and a unique Cookie ID to identify the browser which connects to the website. Cookies enable the website to remember information about your visit and may be used to gain such information as geographic location from which a connection with our website has been made, manner of getting to the website, duration of stay on particular sites, and type of device used (desktop / mobile, operating system).

We process cookies to:

- ★ adjust the content of our website to user's preferences and optimize the process of using our website (e.g. by recognizing the user's device and displaying the version for mobile devices),
- ★ create statistics which help to understand how website users use the website, which makes it possible to improve its functionality and content,
- ★ provide users with advertising content which is relevant to their interests.

Details on using cookies and types of files used by Onwelo, including third-party cookies, can be found in our [Cookie Policy](#).

The basis for processing cookies depends on their type, and thus in the case of:

- ★ necessary cookies and session cookies – their basis for processing is Onwelo's legitimate interest (Article 6(1)(f) of GDPR), consisting in ensuring the proper functioning of the website,
- ★ analytics, functional and advertising cookies – the basis for processing is your consent given upon visiting our website when our cookie acceptance tool appears which enables you to accept or reject them; you can withdraw your consent at any time by changing your browser settings – more details can be found in our [Cookie Policy](#).

The duration of processing cookies depends on their type. Session cookies are deleted immediately upon closing the browser, other cookies have a set validity period. You can also disable or remove cookies on your own in your browser. For details, see our [Cookie Policy](#).

INFORMATION YOU PROVIDE TO US

Contact forms

Our website enables you to ask questions regarding our products and services via our contact form. Using the contact form requires entering your personal data necessary to contact you and answer your question – i.e. your name and e-mail address. In your query, you may also provide other data to help us to contact you or process your query.

We process the data provided by you to:

- ★ identify the sender and process your query sent via the contact form,
- ★ market our products and services – if you have additionally agreed to receive such information (more information about marketing can be found in a separate paragraph below).

We process contact form data based on:

- ★ Onwelo's legitimate interests (Article 6(1)(f) of GDPR), consisting in the need to solve the reported matter related to our business operations, and to be able to determine, seek compensation of, and defend against, any possible claims,
- ★ your consent to the marketing of our products and services, including by Onwelo SA Group companies (Article 6(1)(b) of GDPR), which you can withdraw at any time.

We process the data for a period which enables us to pursue our legitimate interests, or until the data subject effectively objects to data processing, in any case no longer than until any possible claims become time-barred. If data are being processed based on consent for the purposes related to sending marketing and sales messages, we will process them until the consent is withdrawn.

Marketing of our products and services

If you have agreed to receive sales information for us, in order to perform that service we will use the personal data you provided via the contact form.

In such case, we process data in order to send sales information, including for the purpose of direct marketing of services of Onwelo SA Group companies, defined as sending marketing messages (including informational, sales and promotional content) by e-mail.

We process data based on your consent (Article 6(1)(f) of GDPR) for electronic communications in order to receive such information from us. You may withdraw your consent at any time by clicking the deactivation link included in each marketing message.

We process the data until you resign from receiving sales information (i.e. until you withdraw consent or file an objection).

Profiling

For the purpose of engaging in direct marketing of our products and services, to provide you with personalized marketing messages, we may create a profile of your preferences and interests based on the data collected automatically via cookies.

Profiling results in displaying personalized marketing messages concerning our products and services, also on the websites of entities not related to us, via advertising networks of Google, Facebook, LinkedIn and Twitter – to this end, we process unique identifiers (via cookies), time of visit and browsing history within the website. In order to analyze, profile and personalize messages, we use external analytics (Google Analytics, Google Tag Manager) and advertising tools (Google Ads, Facebook Pixel, LinkedIn Insight Tag).

Profiling is aimed at adjusting our marketing content and information to your interests. The data are not used for automated decision-making. The profiling performed by us does not result in making decisions which carry legal effects for you or affect you in a similarly significant manner.

We process data based on:

- ★ Onwelo's legitimate interest (Article 6(1)(f) of GDPR), consisting in carrying out direct marketing activities, including profiling,
- ★ your consent regarding using cookies given by you upon visiting our website when the cookie acceptance tool appears which enables you to accept or reject cookies. You may withdraw your consent at any time by changing your browser settings – more details can be found in our [Cookie Policy](#).

We process the data until the end of the validity period of particular cookies or until you resign from receiving personalized messages, i.e. withdraw your consent or object to profiling by rejecting cookies, erasing them or blocking them in your browser settings.

Phone or e-mail communications to e-mail addresses and phone numbers provided on the website

If you contact us by phone or e-mail, to phone numbers and e-mail addresses provided on our website, we will collect your personal data which is necessary to process the matter in question, e.g. your name, phone number and e-mail address.

We process the data provided by phone or correspondence in order to communicate with you and solve the matter to which the contact or correspondence refers.

In such case, the basis for processing is Onwelo's legitimate interest (Article 6(1)(f) of GDPR) consisting in the need to solve a reported matter and/or conduct correspondence related to our business operations, and to be able to determine, seek compensation of, and defend against, any possible claims.

We process the data for a period which enables us to pursue our legitimate interests, or until the data subject effectively objects to data processing, in any case no longer than until any possible claims become time-barred.

Onwelo's social media profiles

Onwelo has public profiles on social media such as Facebook, LinkedIn, Xing, Instagram, and Twitter. Therefore, we may process the data you leave when visiting our profiles (including comments, likes, Internet IDs).

We process those data:

- ★ to enable activity on our profiles,
- ★ to answer questions asked via social media,
- ★ to promote a range of Onwelo's events and services,
- ★ for statistic and analytical purposes.

Please bear in mind that social media sites also collect data on their own (in relation to user profiles created there), so it is worth reading a privacy policy of any site on which you create a user account.

We process those data based on Onwelo's legitimate interests (Article 6(1)(f) of GDPR), consisting in promoting our brand and services.

We process the data for a period which enables us to pursue our legitimate interests, or until a data subject files an effective objection to data processing.

Determining, seeking compensation of, and defending against claims

If our website is used in an illegal manner or if you suffer damage in relation to using our website, it is possible to determine, seek compensation of, or defend against, claims.

For that purpose, we may process the data provided in electronic forms, system logs, data on website use and other data necessary to prove the existence of a claim.

In such case, we process data based on Onwelo's legitimate interest (Article 6(1)(f) of GDPR), consisting in determining, seeking compensation of, and defending against, any possible claims related to the website.

The data will be processed until any possible claims become time-barred.

TO WHOM DO WE PROVIDE YOUR PERSONAL DATA?

Your personal data processed in relation to using the website may be provided to:

1. Authorized public authorities, e.g. police, prosecutor's office, court and supervisory bodies in the area of personal data protection in order to meet our legal obligation.
2. Onwelo SA Group companies if you agree to providing your personal data.
3. Our suppliers and service providers with whom we cooperate in the area of:
 - ★ statistic or analytics services (e.g. Google Analytics, Google Tag Manager),
 - ★ systems for online marketing (e.g. Google Ads, Facebook Pixel, LinkedIn Insight Tag),
 - ★ IT services and infrastructure (e.g. Microsoft Corporation, hosting companies)
 - ★ marketing activities,
 - ★ legal advice.

Some of our suppliers and service providers may be based outside the European Economic Area (EEA), and thus your data may be processed outside that area. If the data is transferred to a third country with regard to which no EU adequacy decision has been adopted, Onwelo uses appropriate safeguards via standard data protection clauses adopted by the European Commission or a supervisory authority (under Article 46(2)(c) and (d) of GDPR). The terms and conditions of transferring personal data to third countries can be found at:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

SOCIAL MEDIA AND LINKS TO THIRD-PARTY WEBSITES

Our website includes links to third-party websites. If you want to use them, you are advised to read their privacy policies.

On our website, we have also integrated so called social media plug-ins which enable us to directly redirect users to our profiles on those websites:

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

Upon clicking the plug-in, your browser is directly linked with the given website's server. If at the time you are logged in on any of the social media sites, information about a visit to our website will be sent to their servers which can be assigned to your account on that social media site. If you do not want to provide that data, you should log out of the given social media site before clicking the plug-in. The purpose and scope of collecting data and their further processing and use by social media, and your related rights and possibilities of adjusting settings in order to protect your privacy, can be found in social media sites' privacy policies.

WHAT ARE YOUR RIGHTS RELATED TO THE PROCESSING OF YOUR PERSONAL DATA?

Under the provisions of GDPR, you have the following rights:

1. Right to access your personal data and request their copies (Article 15 of GDPR).
2. Right to obtain rectification (correction) of your personal data (Article 16 of GDPR).
3. Right to restriction of personal data processing in cases defined in Article 18 of GDPR.
4. Right to erasure of personal data in cases defined in Article 17(1) of GDPR with exceptions defined in Article 17(3) of GDPR.
5. Right to data portability in cases specified in Article 20 of GDPR.
6. Right to object to personal data processing in cases specified in Article 21 of GDPR – you may at any time object to the processing of your personal data, including profiling, if we process your data based on our legitimate interest (e.g. marketing of our products and services).
7. Right to withdraw consent – you may withdraw the granted consent if we process your data based on consent. The withdrawal is applicable only to the future and does not affect the lawfulness of processing based on consent before its withdrawal.

Requests to exercise the rights may be sent to personaldata@onwelo.com.

SUPERVISORY AUTHORITY

You have the right to lodge a complaint with a supervisory authority if you believe that the controller processes your personal data unlawfully. The supervisory authority to the extent of personal data processing by Onwelo SA is Polish Personal Data Protection Office (<https://uodo.gov.pl/en>).

UPDATING THE PRIVACY POLICY

Any changes to this Privacy Policy will be made by publishing its new version on our website.

* Regulation of the European Parliament and of the Council (EU) 2016/679 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)

