

PRIVACY POLICY

1. For the Owner of this website, the protection of Users' personal data is of the utmost importance. They make every effort to ensure that Users feel safe when entrusting their personal data while using the website.
2. This privacy policy explains the key principles and scope of processing the User's personal data, the principles of personal data protection, the User's rights, as well as the obligations of the Data Administrator, and also informs about the use of cookies and other tracking technologies in connection with the use of the website www.equinoxconsulting.pl.
3. The Administrator employs the most modern technical measures and organizational solutions to ensure a high level of protection for the processed personal data and to safeguard against unauthorized access.
4. For any questions regarding the processing of personal data, we encourage you to contact us via email: info@equinoxconsulting.pl.

I. PERSONAL DATA ADMINISTRATOR

The administrator of personal data is Equinox Consulting Sp. z o.o. with its registered office at: Al. KEN 57/111, 02-797 Warsaw, registered in the register of entrepreneurs maintained by the District Court in Warsaw, XIII Commercial Division, under the National Court Register number: 0000759994, TIN: 5213848076 (hereinafter referred to as the "**Administrator**").

II. DEFINITIONS

1. Cookies – means IT data, in particular small text files, saved and stored on devices through which the User uses the Website.
2. Administrator's Cookies – means Cookies placed by the Administrator, related to the provision of electronic services by the Administrator via the Website.
3. External Cookies – means Cookies placed by the Administrator's partners, via the Website.
4. Website – the website available at: www.equinoxconsulting.pl.
5. User – a natural person, legal entity, or an organizational unit without legal personality, which is granted legal capacity by law, using electronic services available on the website.

III. PURPOSE AND PRINCIPLES OF PROCESSING PERSONAL DATA

1. The Administrator processes the User's personal data for the following purposes:
 - a. providing electronic services related to making content collected on the website available to Users;
 - b. preparing analytical and statistical reports;
 - c. potentially establishing and pursuing claims or defending against claims;
 - d. conducting marketing activities;
 - e. sending newsletters;
 - f. providing services.
2. The User may also consent to receiving information about news and promotions, which will result in the Administrator processing personal data to send the User commercial information regarding, among other things, new products or services, promotions, or sales.
3. Personal data is also processed to fulfil legal obligations imposed on the Administrator and to carry out tasks in the public interest, including tasks related to security and defence or the storage of tax documentation.
4. Personal data may also be processed for the purposes of direct marketing of products, securing and pursuing claims, or protecting against claims by the User or a third party, as well as marketing services and products of third parties or the Administrator's own marketing, which is not direct marketing.
5. The Administrator processes personal data only after obtaining the User's prior consent.
6. Consent to the processing of personal data is entirely voluntary.
7. Providing personal data is voluntary but necessary for processing the User's data to respond to inquiries initiated by the User and to provide services offered by the Administrator.
8. The Administrator processes the User's personal data based on explicit consent in the case of newsletter subscriptions.

IV. METHOD OF PROCESSING DATA

1. The Administrator ensures control over the type and scope of personal data processing, the period, and the manner of their processing.
2. The Administrator guarantees the confidentiality of all provided personal data and informs that it does not share the provided data with any third parties.
3. Personal data is collected with due diligence, as necessary measures have been taken to protect it from access by unauthorized persons. At the same time, the requirements set out in 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) have been implemented.

4. The Administrator stores personal data only for as long as it is necessary to achieve the purpose for which the personal data was collected, unless otherwise required by applicable law.
5. The Administrator declares that:
 - a. Administrator processes personal data in accordance with the law;
 - b. Administrator collects personal data for specified, lawful purposes and does not further process it in a manner incompatible with those purposes;
 - c. Administrator stores personal data in a form that allows identification of the data subjects for no longer than is necessary to achieve the purpose of processing.
6. Access to personal data is granted to the Administrator.

V. SHARING AND ENTRUSTING THE PROCESSING OF PERSONAL DATA

1. The Administrator does not share, sell, or otherwise disclose collected personal data concerning Users, except as described in the Policy or when required by applicable law.
2. The personal data of website Users is not transferred outside the European Union.
3. The Administrator may entrust the processing of personal data to service providers acting on its behalf. Under the agreements for entrusting the processing of personal data concluded with them, the Administrator requires these service providers to comply with the legal standards of privacy and security of personal data.
4. The Administrator has entrusted the processing of personal data to service providers, including a hosting company for storing personal data on a server and a company enabling the operation of the newsletter.
5. This Privacy Policy complies with the provisions of Article 13(1) and (2) of the GDPR.

VI. RIGHTS OF THE USER

1. The User may at any time request information from the Administrator regarding the scope of processing of their personal data.
2. The User may at any time request access to their data, as well as its correction or rectification.

3. The User may at any time withdraw their consent to the processing of their personal data without providing a reason. The request to stop processing data may relate to a specific purpose of processing indicated by the User, such as withdrawing consent to receive commercial information, or it may relate to all purposes of data processing. Withdrawal of consent for all purposes of processing will result in the User's account being deleted from the website, along with all personal data previously processed by the Administrator. The withdrawal of consent will not affect actions already taken.
4. The User may at any time request, without providing a reason, that the Administrator delete their data. The request to delete data will not affect actions already taken. The deletion of data will result in the simultaneous deletion of the User's account, along with all personal data stored and processed by the Administrator up to that point.
5. The User may at any time object to the processing of their personal data, either in relation to all personal data processed by the Administrator or in a limited scope, such as objecting to the processing of data for a specific purpose. The objection will not affect actions already taken. Submitting an objection will result in the deletion of the User's account, along with all personal data stored and processed by the Administrator up to that point.
6. The User may request the restriction of the processing of their personal data, either for a specified period or without a time limit but within a specific scope, which the Administrator will be obliged to fulfil. This request will not affect actions already taken.
7. The User may request that the Administrator transfer their processed personal data to another entity. To do so, the User should submit a written request to the Administrator, specifying the entity (name, address) to which the User's personal data should be transferred and which specific data the User wishes to be transferred. After the User confirms their request, the Administrator will electronically transfer the User's personal data to the specified entity. Confirmation by the User is necessary to ensure the security of the User's personal data and to confirm that the request comes from an authorized person.
8. The Administrator will inform the User of the actions taken within one month of receiving one of the requests mentioned in the previous points.
9. The User may file a complaint with the supervisory authority regarding the processing of their personal data by the Administrator.

VII. EMAIL CONTACT

1. When contacting the Administrator via email, the User provides their email address. Additionally, the message may contain other personal data.

2. The legal basis for processing personal data is the consent resulting from initiating contact with the Administrator.
3. Personal data provided during email contact is processed solely for the purpose of handling the inquiry. The content of the correspondence may be archived.

VIII. DATA RETENTION PERIOD

1. Generally, personal data is stored only as long as necessary to fulfil the contractual or legal obligations for which it was collected. This data will be deleted immediately when its retention is no longer necessary, for evidentiary purposes, in accordance with civil law, or due to a statutory obligation to retain data.
2. Information related to the contract is stored for evidentiary purposes for a period of three years, starting from the end of the year in which the business relationship with the User ended. Data will be deleted after the statutory limitation period for contractual claims has expired.
3. Additionally, the Administrator may retain archival information regarding concluded transactions, as their retention is related to potential claims by the User, such as warranty claims.
4. If no contract has been concluded between the User and the Administrator, the User's personal data is stored until the User's account on the website is deleted. Account deletion may occur as a result of a request by the User, withdrawal of consent to process personal data or objection to the processing of this data.

IX. COOKIES

1. The website uses cookies or similar technology (hereinafter collectively referred to as "cookies") to collect information about the User's access to the website (e.g., via a computer or smartphone) and their preferences. Cookies can be read by the Administrator's IT system.
2. The Administrator stores cookies on the User's device and then accesses the information contained in them for the following purposes:
 - a. analysis, research, and audience measurement, particularly to create anonymous statistics that help understand how Users use the website, enabling improvements to its structure and content;
 - b. marketing (remarketing);
 - c. determining the User's profile to display tailored materials in advertising networks, particularly the Google network;

- d. ensuring the proper functioning of the Website.
3. Cookies are pieces of information that contain a unique reference code, which the website sends to the User's device to store and sometimes track information about the device used. They usually do not allow the identification of the User. Their primary purpose is to better adapt the website to the User's preferences.
 4. Some cookies on the website are available only during the internet session and expire when the browser is closed. Other cookies are used to remember the User, who is recognized upon returning to the website. These are retained for a longer period.
 5. All cookies on the website are set by the Administrator. All cookies used by this website comply with applicable European Union law.
 6. Most Users and some mobile browsers automatically accept cookies. If the User does not change the settings, cookies will be stored in the device's memory.
 7. The User can change their preferences regarding the acceptance of cookies or modify their browser to receive appropriate notifications each time a cookie is set. To change cookie acceptance settings, adjust the settings in the browser.
 8. It is worth noting that blocking or deleting cookies may hinder or prevent full use of the website.
 9. Cookies can be deleted by the User after they are stored by the Administrator, using the appropriate browser functions, programs designed for this purpose, or tools available within the operating system used by the User.
 10. Cookies will be used for essential session management, including:
 - a. creating a special login session for the website User so that the website remembers that the User is logged in and their requests are delivered effectively, securely, and consistently;
 - b. recognizing a User who has previously visited the website, allowing the identification of the number of unique users who have used the service and ensuring sufficient capacity for new users;
 - c. recognizing whether a visitor to the website is registered on the website;
 - d. recording information from the User's device, including cookies, IP address, and browser information, to diagnose problems, administer, and track the User's activity on the site;
 - e. customizing elements of the layout or content of the website;
 - f. collecting statistical information about how the User uses the website to improve the site and determine which areas of the website are most popular among Users.

X. OTHER TECHNOLOGIES

1. The Administrator uses the following tracking technologies to monitor actions taken by the User on the Website, including:
 - a. Google Analytics tracking code – for analysing website statistics;
 - b. Facebook conversion pixel – for managing Facebook ads and conducting remarketing activities.

XI. SERVER LOGS

1. Using the Website involves sending requests to the server where the Website is hosted.
2. Each request sent to the server is recorded in the server logs. The logs include, among other things, the User's IP address, server date and time, and information about the web browser and operating system used by the User.
3. Logs are saved and stored on the server.
4. The data recorded in the server logs is not associated with specific individuals using the Website and is not used by the Administrator to identify the User.
5. Server logs are solely auxiliary material used for administering the Website, and their content is not disclosed to anyone except those authorized to administer the server.