

PRIVACY POLICY



1. For the attention of the user

Every day we care about the protection of personal data of our Customers, but we show even greater commitment every day by caring about safety and comfort of users of our websites.

For this reason, we provide you in this document with essential information answering the questions: *who, what, for what purpose and for how long*, will process personal data on our websites.

2. Who is the Data Administrator?

The administrator of Users' personal data is Cargotor Sp. z o. o. with its registered office in Warsaw (03 - 802) ul. Lubelska 13

How to get in touch with us, you have a few options as listed below:

- you can call: (22) 290-55-65
- write an e-mail: sekretariat@cargotor.com
- send a letter to the following address: 03-802 Warszawa ul. Lubelska 13

3. Have we appointed a Data Protection Inspector?

The protection of personal data processed is extremely important to us. That is why we have appointed a Data Protection Inspector, in the person of Mr. Przemysław Chąciak, whom you have the right to contact as regards the protection of personal data by e-mail: iod@cargotor.com or by traditional means by sending correspondence to the following address: Cargotor Sp. z o. o. 03 - 802 Warsaw ul. Lubelska 13 with a note: Data Protection Inspector.

4. What personal data do we process?

It all depends on you, but in certain situations we may process:

A name and surname, e-mail address, telephone number, User's IP, location, type of device, and in addition, the content of question, information and answer given in e-mail and telephone correspondence.

The data indicated above we collect always from the User.

5. For what purpose do we process the indicated personal data?

Website

We process most of all:

- in order to keep statistics of visits to our website, which may relate to such information as: time spent, activity, quality of the displayed content, your location or information about the device you use while browsing our website;
- in order to allow contacting us via the contact form provided on the website, where we can respond, if we know who we correspond with and to which address we should send the answer;
- in order to request a telephone contact, since we cannot rule out that you will ask us via the contact form to call you back to the given number or
- maybe you will call on your own to numbers indicated on the website, where your number will be saved in our telephone directory;
- in order to defend or pursue claims arising from our legitimate interest.

6. How long will we process personal data?

It all depends on the purpose of processing and the basis on which the processing is based.

Website

A. Query (contact form):

For the period necessary to process your query, but no longer than 6 months or earlier, if you withdraw your consent or raise an objection to the processing. However, if the query is sent to present a quotation, and on its basis we shall establish cooperation, the retention period will be extended by a time appropriate for the duration of further business relationship and the duration of further processing of personal data in connection with the agreement and limitation of claims arising therefrom.

B. Contact request (contact form):

For the period necessary to process it (no longer than 1 month), unless due to conversation we shall establish a business relationship, then the retention period will be extended by a time appropriate for the duration of further business relationship and the duration of further processing of personal data in connection with the agreement and limitation of claims arising therefrom.

C. Statistics (service):

For a period not longer than 3 years. Why?, because we want to compare and observe the development of our website.

D. Defence and pursuing claims:

If at any moment we find that the personal data processed is necessary for us to pursue or defend against claims or it arises from legal provisions, we will process personal data for

longer time than periods specified above, for the time necessary to achieve the purpose of its processing.

7. On what legal grounds do we process personal data?

Below we present various legal bases depending on the purpose of its processing.

- A. Query (contact form) - your consent (by sending a message you give a consent) art. 6 para. 1(a) GDPR.
- B. Contact request (contact form) - your consent (by sending a message you give a consent) art. 6 para. 1(a) GDPR.
- C. Marketing of own products and services - Our legitimate purpose regarding art. 6 para. 1(f) GDPR.
- D. Statistics (service) - Our legitimate purpose regarding the proper management of the website art. 6 para. 1(f) GDPR.
- E. Defence and pursuing claims - Our legitimate purpose regarding defence or pursuing claims art. 6 para. 1(f) or when we are obliged to process the data by the provisions of art. 6 para. 1(c) GDPR.
- F. When we establish a business relationship - agreement, art. 6 para. 1(b) GDPR.

8. Do we process personal data of children?

Our website is not intended for children under the age of 16.

9. With whom and why can we share personal data?

We do not disclose any personal data of Users of our websites, except when it is necessary in connection with the conducted business or in situations required or permitted by the provisions of law.

When will we transfer personal data?

In certain instances, in the form of entrusting its processing, we may transfer the personal data acquired by us to cooperating suppliers so that they can process personal data on our behalf.

We can, when in connection with the conducted business, sharing personal data directly arises from the provisions of law - sharing personal data in response to queries from judiciary and law enforcement authorities, as well as in order to comply with relevant provisions of law, orders or regulations issued by judicial authorities, as well as regulations issued by government and professional institutions.

We do not transfer data to third parties with their registered offices in countries outside the European Economic Area (EEA).

10. What rights you are entitled to in connection with processing of your personal data?

You have rights worth knowing about so that you can exercise them, and which are guaranteed by the GDPR.

You have the right to:

- **request access to your own personal data** (including obtaining confirmation whether they are processed and obtaining information, e.g. about the purposes, sources, categories of data processing or the retention period), which also includes the right to receive a copy of your own data free of charge (for any subsequent copies requested by the data subject, we may charge a reasonable fee based on administrative costs);
- **to correct personal data** (if they are incorrect), which also includes the right to supplement incomplete personal data, but for this purpose we may ask to provide an additional statement from you;
- **to delete personal data** (the so-called "right to be forgotten"), when, for example, it is not necessary for pursuing purposes for which it was collected, consent to its processing has been withdrawn or there are no other legal grounds for its processing;
- **to limit data processing**, for example, when you contest the correctness of personal data - for a period allowing us to check the correctness of this data;
- **to file an objection against processing;**
- **to transfer data**, including receiving from us in a structured, commonly used and machine-readable format your own personal data that you provided to us;
- **to withdraw your consent** to the processing of data (however, the withdrawal of consent does not affect the legality of processing which was carried out on the basis of the consent given before its withdrawal);
- **to lodge a complaint with the President of the Personal Data Protection Office** when you believe that the processing of your personal data infringes the provisions of the GDPR.

11. How can you exercise your rights?

You can bring your right to the Administrator at any moment. To this end, read the information available **here (PDF)**, at www.cargotor.com you will find all the necessary information regarding the procedure.

You bring the right of complaint to the President of the Data Protection Office. All necessary information you will find at www.uodo.pl

12. General information, but maybe worth reading

What is personal data and what does the data processing mean?

Personal data includes information about an identified or identifiable natural person. The processing of personal data includes basically any activity on personal data, regardless of whether it is carried out in an automated manner or not, e.g. collecting, storing, recording, arranging, modifying, browsing, using, sharing, limiting, deleting or destroying data. We process your personal data specified in this document for various purposes, whereas different acquisition methods, grounds for lawful processing, use, disclosure and storage periods may be used in the processing, which are always determined in relation to the purpose for which the data is processed by us.

When does this Privacy Policy apply?

This Privacy Policy applies to all instances in which we are the Administrator of personal data and we process personal data in connection with the shared websites. This applies both to instances in which we process personal data acquired directly from the data subject, as well as

to instances in which we acquired personal data from other sources.

Currently, the privacy policy applies to:

Websites: www.cargotor.com

How do we care about safety of personal data?

We make every effort to protect users against unauthorized access, unauthorized modification, disclosure and destruction of personal data.

In particular:

- we use SSL encryption;
- we control our methods of collecting, storing and processing information, including physical safety measures to protect against unauthorized access to the system;
- we provide an access to personal data only to those employees and contractors and representatives who must have an access to it in order to process it for our needs. In addition, they are contractually bound to maintain strict confidentiality;
- and if they fail to meet these obligations, they may suffer consequences, including the termination of cooperation.

Do we want to process Users' sensitive data?

No, we do not want to, therefore we ask our Users to be careful when sharing their personal data, in particular never to disclose any sensitive data, e.g. health condition.

Can we change the content of this policy?

This Privacy Policy may be subject to change from time to time. User's rights under this Privacy Policy will not be limited without the user's express consent. Any changes to the Privacy Policy will be published on this website, and we will inform you about significant changes in a more visible way. We also keep previous versions of this Privacy Policy in the archive to allow users getting familiar with them.

The document made available to website users	
Adopted on	Version I of