

# PRIVACY POLICY OF THE AZTEC-INTERNATIONAL.EU WEBSITE

## GENERAL PROVISIONS

This privacy policy of the Site is of informative nature, which means that it shall be no source of obligations for service users of the Site. The privacy policy contains, above all, the principles concerning the processing of data by the Controller in the Site, including the basis, purpose and period of personal data processing and the rights of data subjects as well as information regarding the use of cookies and analytical tools in the Site.

The Controller of the personal data collected via the Site shall be the company AZTEC INTERNATONAL SPÓŁKA AKCYJNA based in Tarnowo Podgórne (office address and correspondence address: ul. Sowia 13 C, 62-080 Tarnowo Podgórne); registered in Register of Entrepreneurs of National Court Registry under the number: 0000311478; Register Court which holds the company's documentation: District Court for Poznań – Nowe Miasto i Wilda in Poznań, VIII Commercial Department of National Court Registry; share capital in amount of 3 414 667,00 PLN fully paid; Tax ID no. NIP: 7871922976; REGON: 634231705, e-mail address: sales@aztec-international.eu, telephone number: (+48) 618 676 085 and fax number (+48) 618 673 444 – hereinafter referred to as “**Controller**” and being simultaneously the Owner of the Site.

Personal data in the Site shall be processed by the Controller in accordance with the binding legal regulations, in particular the 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) - hereinafter referred to as “**GDPR**” or “**GDPR Regulation**”. The official text of the GDPR Regulation: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>.

Using the Site is voluntary. Similarly, providing personal data by the service user using the Site is voluntary, with an exception, that failure to provide the personal data necessary for the use of electronic services on the Site (i.e. contact form) shall result in no possibility of using such services by the user. Providing personal data in such a case is a required for the purposes resulting from the legitimate interests of the Controller and if the data subject is willing to use the contact form and receive the response for their request from the Controller, they shall be obligated to provide the required data. The scope of the data required to use the Site's electronic services is each time specified in advance on the Site by the Controller.

The Controller assures due diligence to protect the interest of persons being data subjects, in particular being responsible and liable for and assuring that the data collected are: (1) processed in accordance with the law regulations; (2) collected for specific, legal purposes and not subject to further processing inconsistent with the purposes; (3) correct as regards the subject matter and adequate as regards the purpose of the processing; (4) stored in a form making it possible to identify the people they apply to, no longer than it proves necessary to attain the purpose of processing and (5) processed in a manner ensuring security of the personal data, including the protection against illicit or illegal processing or accidental loss, damage or destruction, with the use of appropriate technical and organisational measures.

Taking into account the nature, scope, context and purpose of processing as well as the risk of breaching the rights or freedoms of natural persons with varied likelihood and degree of threat, the Controller is implementing appropriate technical and organisational measures so that the processing takes place pursuant to the GDPR Regulation and it is possible to show it. The measures are reviewed and updated, as necessary. The Controller applies technical measures preventing the acquisition and modification of personal data sent electronically by unauthorised persons.

Any words, phrases and acronyms used in this privacy policy starting with a capital letter shall be understood in accordance with the meaning resulting from this privacy policy.

## BASIS FOR THE PROCESSING OF DATA

The Controller is authorised to process the personal data in cases, and to the extent, when at least one of the following conditions is met: (1) the data subject consented to the processing of their data to one or more specified ends; (2) processing is necessary for contract performance the data subject is a party to, or to take actions to the request of the data subject, prior to contract conclusion; (3) processing is necessary to meet the legal obligation of the Controller; or (4) processing is necessary for the needs resulting from the legally justified interests of the Controller or third party, except for

situations when the interests or basic rights and freedoms of the data subject override such interests and they require personal data protection, especially when the data subject is a child.

The processing of personal data by the Controller each time requires having at least one basis indicated above. Specific bases for processing personal data of the service users of the Site by the Controller are specified in the following point of the privacy policy – as regards the specific goal of processing personal data by the Controller.

## PURPOSE, BASIS AND PERIOD OF PROCESSING DATA ON THE SITE

Each time, the purpose, basis, period and scope as well as the recipients of personal data being processed by the Controller result from actions undertaken by a given service user in the Site.

The Controller may process the personal data in the Site for the purposes, on the bases and within the periods as follows:

Purpose of data processing	Legal basis for processing the data	Period of data storage
Using the contact form by the service user	Article 6, par. 1, point b) of the GDPR Regulation (legitimate interest of the Controller) – the processing is required for the purposes resulting from the legitimate interests of the Controller which includes the necessity to read the request sent by the data subject using the contact form available on the Site, and then, if necessary, to answer their request	The data shall be stored for the period necessary for the Controller to read and answer the request received from the data subject, however, no longer than the period of the legitimate interest of the Controller resulting from the received request.
Direct marketing	Article 6, par. 1, point f) of the GDPR Regulation (legitimate interest of the Controller) – the processing is required for achieving the goals based on the legitimate interest of the Controller which includes upholding interests and strengthening reputation of the Controller and the Site as well as his commitment for increasing provision of services	The data shall be stored for the period of the legitimate interest of the Controller, however no longer than the period of limitation of claims as regards the data subject under the business activity of the Controller. The period of limitation shall be specified by legal provisions, in particular the Civil Code (the basic period of limitation in the case of claims related to business activity amounts to three years).  The Controller may not process the data for the needs of direct marketing in the case of expressing clear objection in this field by the data subject.
Marketing	Article 6, par. 1, point a) of the GDPR Regulation (consent) – the data subject expressed the consent to process its personal data for marketing purposes by the Controller	The data are stored until the data subject withdraws the consent to further process their data to that end.
Determining, pursuing or defence of claims on the side of the Controller, or ones that may arise as regards the Controller	Article 6, par. 1, point f) of the GDPR Regulation (legitimate interest of the Controller) – the processing is required for the purposes resulting from the legitimate interests of the Controller which includes determining, pursuing or defence of claims on the side of the Controller, or ones that may	The data shall be stored for the period of the legitimate interest of the Controller, however no longer than the period of limitation of claims against the Controller. The period of limitation shall be specified by legal provisions, in particular the Civil Code (the basic period of limitation in the case of claims against the

	arise as regards the Controller	Controller amounts to six years).
Use of the Site and ensuring its proper functioning	Article 6, par. 1, point f) of the GDPR Regulation (legitimate interest of the Controller) – the processing is required for the purposes resulting from the legitimate interests of the Controller which includes operating and maintenance of the Site	The data shall be stored for the period of the legitimate interest of the Controller, however no longer than the period of limitation of claims as regards the data subject under the business activity of the Controller. The period of limitation shall be specified by legal provisions, in particular the Civil Code (the basic period of limitation in the case of claims related to business activity amounts to three years).
Preparing statistics and analysing the manner of the data subject conduct on the Site	Article 6, par. 1, point f) of the GDPR Regulation (legitimate interest of the controller) – the processing is required for the purposes resulting from the legitimate interests of the Controller which includes preparing statistics and analysing the manner of the data subject conduct on the Site in order to improve the functioning of the Site	The data shall be stored for the period of the legitimate interest of the Controller, however no longer than the period of limitation of claims as regards the data subject under the business activity of the Controller. The period of limitation shall be specified by legal provisions, in particular the Civil Code (the basic period of limitation in the case of claims related to business activity amounts to three years).

## DATA RECIPIENTS ON THE SITE

For the needs of proper Site functioning, it shall be necessary for the Controller to make use of external companies' services (e.g. software provider). The Controller uses solely the services of such processing entities which ensure sufficient guarantee to implement appropriate technical and organisational measures so that the processing meets the requirements set out in the GDPR Regulation and protects the rights of data subjects.

The Controller may provide personal data to a third country, while the Controller ensures, that it shall only be a third country which is considered to provide adequate level of protection – in accordance with the GDPR Regulation, and in the case of other countries that the transfer will take place on the basis of standard data protection clauses. The Controller ensures that the data subject has a right to get a copy of their data. The Controller provides personal data to a third country only in case and scope necessary to execute a certain purpose of data processing consistent with this privacy policy.

Providing data by the Controller does not take place in every case and not to all the recipients or categories of recipients defined in the privacy policy – the Controller provides the data only in the case it proves necessary to attain a given purpose of personal data processing and solely within the necessary scope.

Personal data of the Site service users may be provided to the following recipients or categories of recipients:

- **service providers rendering for the Controller technical, IT or organisational solutions, making it possible for the Controller to conduct a business, inclusive of the Site and electronic services provided via it** (in particular computer software providers for the Site, e-mail companies and hosting providers as well as software providers for company management and technical aid for the Controller) – the Controller makes the collected personal data of the service user available to the selected provider operating to their order only in the case and to the extent necessary for attaining a given purpose of data processing in accordance herewith.
- **legal and counselling services providers rendering for the Controller legal or counselling services** (in particular a law firm) – the Controller makes the collected personal data of the service user available to the selected provider operating to their order only in the case and to the extent necessary for attaining a given purpose of data processing in accordance herewith.

## THE RIGHTS OF THE DATA SUBJECT

**The right to access, rectify, restrict, erase or transmit** – the data subject shall have the right to demand the Controller to have access to their personal data, rectify, erase (“the right to be forgotten”) or restrict the processing and shall have the right to object to the processing and transmit their data. Detailed conditions of the above rights shall be indicated in Articles 15-22 of the GDPR Regulation.

**The right to withdraw the consent at any time** – the person whose data are being processed by the Controller on the basis of the consent given (pursuant to Article 6, par. 1, point a) or Article 9, par. 2, point a) of the GDPR Regulation), they shall have the right to withdraw their consent at any time without any impact on the compatibility with the right to process made based on the consent prior to the withdrawal.

**The right to lodge a complaint with a supervisory body** – the person whose data are being processed by the Controller shall have the right to lodge a complaint with a supervisory body in a manner and mode specified in the provisions of the GDPR Regulation and the Polish law, in particular the Personal Data Protection Act. The supervisory body in Poland shall be the President of the Office for Personal Data Protection.

**The right to object** – the data subject shall have the right, at any time, to lodge a complaint – for reasons related to their particular situation – as regards the processing of their personal data based on Article 6, par. 1, point e) (public interest or official authority) or f) (legitimate interest of the controller) in the case of profiling based on the provisions. The Controller in such a case must stop processing the personal data, unless they show the existence of legally significant and justified bases for the processing, overriding the interests, rights and freedoms of the data subject, or the bases for determining, pursuing or defending the claims.

**The right to object as regards direct marketing** – in the case the personal data are being processed for the needs of direct marketing, the data subject shall have the right, at any time, to lodge a complaint as regards the processing of their personal data for the needs of such marketing, including profiling, to the extent to which the processing is related to direct marketing.

To perform the rights mentioned in this point of the privacy policy, one may contact the Controller by sending them an appropriate message in writing or via e-mail to the address of the Controller indicated at the beginning of the privacy policy.

## COOKIES IN THE SITE AND ANALYTICS

Cookies are small pieces of text files sent by the server and saved at the visitor’s of the Site (e.g. on the hard disk of a computer, laptop, or smartphone’s memory card – depending on the type of device used by the Site’s visitor). Detailed information on Cookies as well as the history of their origin can be found e.g. at: [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie).

Cookies, which can be sent via the Site, can be divided into various types, according to the following criteria:

With regard to the provider:	With regard to the period of their retention on the appliance of the Site’s visitor:	With regard to the purpose of their usage:
1) own (created by the Controller’s Site) and 2) belonging to other persons/third parties (other than the Controller)	1) session cookies (stored till the moment of closing of the Site or a browser) and 2) persistent cookies (having some expiration period, defined by parameters of each file or until they are removed by hand)	1) strictly necessary cookies (enabling proper functioning of the website), 2) functional/preferential cookies (enabling adjustment of the website to the visitor’s preferences), 3) analytical and performance cookies (collecting information on the use of the website).

The Controller may process information contained in Cookies during visiting of the Site for the following particular reasons:

Purposes of using Cookies on the	Saving data from the filled-in forms on the Site (strictly necessary Cookies)

<b>Controller's website</b>	and/or functional/preferential Cookies)
	Adjustment of the website contents to individual preferences of the visitor (e.g. colours, font size, layout) and optimisation of the use of the website (functional/preferential Cookies)
	Keeping anonymous statistics presenting the visitor's behaviours on the website (analytical and performance Cookies)

Checking in the most popular internet browsers, which Cookie files (including the expiry period of Cookies and their provider) are being sent in a given moment by the Site can be done, as follows:

<b>In Chrome browser:</b> (1) in the address bar, click the 'locked' icon on the left, (2) go to the benchmark „Cookie files”.	<b>In Firefox browser:</b> (1) in the address bar, click the 'shield' icon on the left, (2) go to the benchmark „Allowed” or „Blocked”, (3) click the button „Tracking cookies between websites”, „Tracing elements of social networks or „Content with tracing elements”	<b>In Internet Explorer browser:</b> (1) Click „Tools” menu, (2) go to „Internet options” benchmark, (3) go to „General” benchmark, (4) then go to „Settings”, (5) click the button „Display files”
<b>In Opera browser:</b> (1) in the address bar, click the 'locked' icon on the left, (2) go to the benchmark „Cookie files”.	<b>In Safari browser:</b> (1) click menu „Preferences”, (2) go to „Privacy” benchmark, (3) click the button „Manage website data”	<b>Independent of the browser used, you can apply tools available e.g. at:</b> <a href="https://www.cookie-matrix.com/">https://www.cookie-matrix.com/</a> or: <a href="https://www.cookie-checker.com/">https://www.cookie-checker.com/</a>

As a standard, most internet browsers on the market accept saving Cookies by default. Every person has the possibility to specify the conditions of using Cookies in the browser settings. It means that one may, e.g. partially restrict (e.g. temporarily) or fully disable saving Cookies – in the latter case it may have an impact on some functionalities of the Site.

The browser settings concerning Cookies are essential as regards the consent to use Cookies by the Site – in accordance with the law, such consent may also be expressed in the browser settings. In view of lack of such consent, change the browser setting accordingly as regards Cookies. Detailed information concerning the change in Cookies settings and their individual removal in the most common browsers is available in the help section of the browser and the following websites (click the link):

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Opera](#)
- [Safari](#)
- [Microsoft Edge](#)

The Controller may use Google Analytics, Universal Analytics services on the Site, which are provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). The services help the Controller to analyse the frequency of visits on the Site. The data collected are processed in order to generate statistics helpful while administering the Site. The data are of collective nature. Using the above services on the Site, the Controller collects such data as the sources and medium of acquiring visitors of the Site and the manner of their conduct on the website of the Site, information concerning their devices and browsers used to visit the website, IP and domain, geographical data and demographic data (age, sex) and interests.

It is possible to easily block sharing information with Google Analytics as regards the activity on the Site – install to that end an opt-out add-on made available by Google Ireland Ltd. available at: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

Due to the possibility of the Controller using the advertising and analytical services provided by Google Ireland Ltd on the Site, Controller indicates that full information on the principles of data processing of visitors to the Site (including information stored in Cookies) by Google Ireland Ltd. is included in the privacy policy of Google services available at the website address: <https://policies.google.com/technologies/partner-sites>.

The Site may contain links to other websites. The Controller encourages that at the time of being transferred to other websites, become familiar with the privacy policy. This privacy policy shall apply only to the Site of the Controller.