

1.1. PRIVACY POLICY

1.2. This document explains how Czerniakowski Capital Sp. z o.o. Sp. k., ul. Senatorska 2, 00-075 Warsaw (Administrator) processes personal data. You can contact the Personal Data Administrator by sending an email to: office@czerniakowski.pl or by sending correspondence to the address above.

1.3. I. Definitions

1.4. a) Administrator - as defined in Article 4(7) of GDPR, a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. In this document, the administrator is: Czerniakowski Capital Sp. z o.o. Sp. k. ul. Senatorska 2, 00-075 Warsaw.

1.5. b) Personal Data - information about an identified or identifiable natural person through one or several specific factors determining physical, physiological, genetic, mental, economic, cultural, or social identity, including device IP, location data, internet identifier, and information collected through cookies and other similar technology.

1.6. c) Policy - this Privacy Policy.

1.7. d) GDPR - 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.

1.8. e) Website - the website operated by the Administrator at <https://czerniakowski.pl/>

1.9. f) User - any natural person visiting the Website or using one or several services or functionalities described in the Policy.

1.10. II. Processing of Personal Data - Purposes and Bases

1.11. The Administrator continuously conducts risk analysis to ensure that Personal Data is processed securely - ensuring primarily that only authorized persons have access to the data and only to the extent necessary due to their tasks. The Administrator ensures that all operations on Personal Data are registered and performed only by authorized employees and associates. The Administrator takes all necessary actions to ensure that its subcontractors and other cooperating entities guarantee appropriate security measures whenever they process Personal Data on behalf of the Administrator.

1.12. In connection with the User's use of the Website, the Administrator collects data necessary to provide particular offered services, and may also process data that does not contain user contact information but can be used to identify a specific device through which the user accesses the website. Combined with other data, the data obtained by the Administrator could be used to identify the user. The Administrator may obtain, for example: IP addresses and internet identifiers, as well as data obtained from cookies. The Administrator uses the data obtained in this way to enable user session identification, adjust displayed content, and for statistical purposes.

1.13. Below are detailed rules and purposes for processing Personal Data collected during the User's use of the Website.

1.14. 1. Processing of Client Data

1.15. Your personal data will be processed for the purpose of:

- Implementing a potential agreement - the basis for processing personal data is Article 6(1)(b) of GDPR
- Using products and services offered by the Administrator - the basis for processing personal data is Article 6(1)(b) of GDPR
- Executing concluded agreements - the basis for processing personal data is Article 6(1)(b) of GDPR
- Issuing and storing VAT invoices and other accounting documents - legal basis Article 6(1)(c) of GDPR
- Establishing, defending, pursuing potential claims - legal basis Article 6(1)(f) of GDPR where the legitimate interest is defense or pursuit of potential claims
- Proper service by the Administrator including responding to inquiries and resolving your matter electronically including through contact on the website communicator or social media as well as by phone in accordance with Article 6(1)(f) of GDPR, where the legitimate interest is proper customer service
- Handling complaints in accordance with Article 6(1)(f) of GDPR, where the administrator's legitimate purpose is handling complaints
- Responding to data subject requests in accordance with Article 6(1)(f) of GDPR

- Archival purposes in accordance with Article 6(1)(c) of GDPR

1.16. Recipients of your data will be exclusively our authorized employees, collaborators, institutions authorized by law, and subcontractors e.g., providing IT support, advertising, legal services to the Administrator.

1.17. Data will be stored for the duration of the Client's business relationship with the Administrator no longer than 6 years from the end of these relations, or until an effective objection is filed.

1.18. You have the right to access your data, rectify it, delete it or restrict its processing, and the right to object to processing.

1.19. You have the right to file a complaint with the supervisory authority - UODO Stawki 2, Warsaw.

1.20. Providing data is voluntary but necessary for the above-mentioned purposes.

1.21. Your personal data will not be profiled and will not be processed in an automated way.

1.22. 2. Website Use

1.23. Personal data of all persons using the Website (including IP address or other identifiers and information collected through cookies or other similar technologies) is processed by the Administrator:

- To provide electronic services in the scope of making content collected in the Website available to Users - then the legal basis for processing is the necessity of processing to perform the contract (Article 6(1)(b) of GDPR)
- For analytical and statistical purposes - then the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of GDPR), consisting in conducting analyses of Users' activity and preferences to improve functionalities and services provided
- For the possible establishment and pursuit of claims or defense against claims - the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of GDPR), consisting in protecting their rights

1.24. 3. Email and Traditional Correspondence, Telephone Contact

1.25. In the case of directing correspondence to the Administrator via email or traditional mail not related to services provided to the sender or other agreement concluded with them, personal data contained in this correspondence is processed solely for the purpose of communication, providing a response, and resolving the matter to which the correspondence relates.

- Personal data is processed for the purpose of conducting ongoing communication including correspondence in connection with business operations as well as defense and pursuit of claims based on Article 6(1)(f) of GDPR where the legitimate interest is ensuring proper service by the Administrator.

1.26. In the case of contacting the Administrator by telephone, in matters not related to a concluded agreement or provided services, the Administrator may request personal data only when it will be necessary to handle the matter to which the contact relates.

- Personal data is processed for the purpose of resolving the reported matter related to conducted business activity based on Article 6(1)(f) of GDPR where the legitimate interest is ensuring proper service by the Administrator.

1.27. 4. Data Collection in Business Contacts

1.28. In connection with conducted business activity, the Administrator also collects personal data in other cases - e.g., during business meetings or through business card exchange - for purposes related to initiating and maintaining business contacts. The legal basis for processing in this case is the Administrator's legitimate interest (Article 6(1)(f) of GDPR) consisting in creating a network of contacts in connection with conducted business activity. Personal data collected in such cases is processed solely for the purpose for which it was collected, and the Administrator ensures its appropriate protection.

1.29. III. Cookies

1.30. Cookies are IT data, in particular text files, which are stored in the Website User's end device and are intended for using the Website's pages. Cookies usually contain the name of the website they come from, the time they are stored on the end device, and a unique number of the User's visits to the Website and actions performed by them.

1.31. We use cookies to:

- Adapt the content of the Website pages to User preferences and optimize the use of websites; in particular, these files allow recognizing the Website User's device and properly displaying the website, tailored to their individual needs
- Create statistics that help understand how Website Users use the websites, which enables improving their structure and content

1.32. We use Google Analytics analytical tool - these are files used by Google to analyze how the User uses the Website, to create statistics and reports on the Website's functioning. Google does not use the collected data to identify the User or combine this information to enable identification.

1.33. IV. Personal Data Processing Periods

1.34. The storage period depends on the type of services provided and the purpose of processing. As a rule, we process data for the duration of using the Website; in the case of sending inquiries, personal data will be stored for the period necessary to respond to the inquiry. In the case of implementing potential agreements, for the period of agreement implementation and potential claims, up to 6 years from its completion. In the case of processing data based on legitimate interest, this data will be processed until an objection is filed. In the case where the basis for processing personal data is consent - until its withdrawal.

1.35. The data processing period may be extended in the case where processing is necessary to establish and pursue potential claims or defend against claims, and after this time only in the case and to the extent required by law. After the processing period expires, the data is irreversibly deleted or anonymized.

1.36. V. Data Subject Rights

1.37. The User has the right to access the content of data and request its rectification, deletion, processing restriction, the right to data portability, and the right to object to data processing.

1.38. You also have the right to file a complaint with the supervisory authority UODO ul. Stawki 2 Warsaw.

1.39. If you need additional information related to personal data protection or want to exercise your rights, contact us:

- Send correspondence to: ul. Senatorska 2, 00-075 Warsaw
- By email: office@czerniakowski.pl

1.40. VI. Who We Share Data With

1.41. Access to personal data is held exclusively by authorized employees and associates of the Administrator.

1.42. In connection with service provision, Personal Data may be disclosed to external entities, including in particular suppliers responsible for IT systems maintenance and entities associated with the Administrator.

1.43. The Administrator reserves the right to disclose selected information about the User to appropriate authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with applicable law.

1.44. VII. Transfer of Personal Data Outside the EEA

1.45. The Administrator does not transfer data outside the EEA, but if it were necessary, they would apply the necessary level of protection in accordance with Chapter V of GDPR, i.e.:

- Cooperation with entities processing Personal Data in countries for which an appropriate European Commission decision has been issued regarding the determination of ensuring an adequate level of Personal Data protection
- Application of standard contractual clauses issued by the European Commission
- Application of binding corporate rules approved by the competent supervisory authority

1.46. The Administrator always informs about the intention to transfer Personal Data outside the EEA at the stage of their collection.

1.47. VIII. Automated Data Processing

1.48. Users' personal data may be processed in an automated way (including profiling), however, this will not cause any legal effects or similarly significantly affect

users' situation. Automated processing, including profiling, may consist of analyzing and evaluating user data to adapt the behavior of services to the configuration of the device and software that the user uses, as well as to user preferences.

1.49. IX. Privacy Policy Updates

1.50. The Policy is continuously verified and updated as needed.

1.51. Last update: 01.01.2025