**PRIVACY POLICY** **WEBSITE** **ETRANSPORTY.PL**

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**1)   GENERAL PROVISIONS**

1. This privacy policy of the Website is informative, which means that it is not a source of obligations for the Service Users of the Website. The privacy policy contains primarily rules for the processing of personal data by the Administrator on the Website, including the basis, purposes and scope of processing personal data and the rights of data subjects, as well as information on the use of cookies and analytical tools on the Website .
2. Administrator of personal information collected through the Service Internet it is **P2 POLAND LIMITED LIABILITY COMPANY,** based in Trzebownisko (registered address: Trzebownisko 4, 36-001 Trzebownisko), entered into the Register of Entrepreneurs of the National Court Register under the number 0000621434; registration court in which the company's documentation is kept: District Court in Rzeszów, XII Commercial Department of the National Court Register, NIP number: 7941822123 and REGON: 364610423, e-mail address: biuro @ etransporty.pl - hereinafter referred to as "A diminator" and being also a Service Provider of the Website.
3. Personal data on the Website is processed by the Administrator in accordance with applicable law, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data the free movement of such data and the repeal of Directive 95/46 / EC (general regulation on data protection) - hereinafter referred to as "RODO" or "RODO Regulation". The official text of the RODO Regulation: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679 .
4. Using the Website is voluntary. Similarly, the provision of personal data by the User using the Website is voluntary, subject to two exceptions: (1) entering into agreements with the Administrator - failing in cases and in the scope indicated on the Website and in the Regulations of the Website and this privacy policy necessary to conclude and perform the contract for the provision of Electronic Services with the Administrator results in the inability to conclude this contract. Providing personal data is in this case a contractual requirement and if the person who concerns the data wants to conclude a given agreement with the Administrator, he is obliged to provide the required data. Each time, the scope of data required to conclude the contract is indicated previously on the Website and in the Regulations of the Website; (2) statutory duties of the Administrator - providing personal data is a statutory requirement resulting from generally applicable legal provisions imposing an obligation on the Administrator to process personal data (eg data processing for the purpose of keeping tax or accounting books) and failure to provide them will prevent the Administrator from performing these duties.
5. The Administrator takes special care to protect the interests of persons whose personal data they process concerns, and in particular is responsible and ensures that the data collected by him is: (1) processed in accordance with the law; (2) collected for specified, legitimate purposes and not subject to further processing incompatible with those purposes; (3) factually correct and adequate in relation to the purposes for which they are processed; (4) kept in a form that permits identification of persons whom they concern, no longer than it is necessary to achieve the purpose of processing, and (5) processed in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organizational measures.
6. Taking into account the nature, scope, context and purposes of processing as well as the risk of violating the rights or freedoms of natural persons with different probabilities and seriousness of risk, the Administrator implements appropriate technical and organizational measures for processing in accordance with this Regulation and to be able to prove it. These measures shall be reviewed and updated where necessary. The administrator uses technical measures to prevent the acquisition and modification by unauthorized persons of personal data sent electronically.
7. All words, expressions and acronyms appearing in this privacy policy and beginning with a capital letter (eg Service Provider, Website, Electronic Service) should be understood in accordance with their definition contained in the Regulations of the Website available on the Website .

**2)   GROUNDS FOR DATA PROCESSING**

1.         The administrator is entitled to process personal data in cases where - and to the extent that - at least one of the following conditions is met: (1) the data subject has consented to the processing of his personal data in one or more specific purposes ; (2) processing is necessary for the performance of a contract to which the data subject is party or take action at the request of the data subject prior to the conclusion of the contract; (3) processing is necessary to fulfill the legal obligation of the Administrator; or (4) processing is necessary for purposes arising from legitimate interests pursued by the Administrator or by a third party, unless the interests or fundamental rights and freedoms of the data subject, requiring the protection of personal data, prevail over these interests. , in particular when the data subject is a child.

2.         The processing of personal data by the Administrator requires each time at least one of the grounds indicated in point. 2.1 privacy policy. The specific basis for processing the personal data of the Service Receivers The Website by the Administrator is indicated in the next point of the privacy policy - in relation to the given purpose of personal data processing by the Administrator.

**3)   PURPOSE, BASIS, PERIOD AND SCOPE OF DATA PROCESSING ON THE WEBSITE**

1.         Each time the goal, the basis, the period and scope and the recipient of personal data processed by the Administrator results from actions taken by a given Service User on the Website .

2.         The Administrator may process personal data on the Website for the following purposes, on the following grounds, in periods and in the following scope:

|  |  |  |
| --- | --- | --- |
| **The purpose of data processing**  | **Legal basis for processing and data retention period**  | **Range of processed data**  |
| Implementation of the Contract of Carriage or contract for the provision of Electronic Services or taking action at the request of the data subject, before concluding the above agreements  | Article 6 paragraph 1 lit. b) RODO Regulations (performance of the contract) The data is stored for the period necessary to implement , terminate or otherwise terminate the concluded contract .  | Maximum range: name and surname; e-mail address; contact phone number; delivery address (street, house number, apartment number, zip code, city, country), address of residence / business / seat (if different from delivery address). In the case of Clients or Customers who are not consumers, the Administrator may additionally process the company's name and tax identification number (NIP) of the Customer or the Customer. The specified range is maximal - in the case of, for example, personal collection, it is not necessary to provide the delivery address.  |
| direct marketing  | Article 6 paragraph 1 lit. f) RODO Regulation (legally justified interest of the administrator) The data is stored for the duration of the legitimate interest pursued by the Administrator, but no longer than during the period of limitation of claims against the data subject, due to the business activity conducted by the Administrator. The limitation period is defined by law, in particular the Civil Code (the basic period of limitation for claims related to running a business is three years, and for a contract of sale two years). The administrator can not process data for direct marketing purposes in case of effective opposition in this regard by the data subject.  | E-mail address  |
| Marketing  | Article 6 paragraph 1 lit. a) Regulation of the GDPR (consent) The data is stored until the data subject withdraws his consent for further processing of his data for this purpose.  | Name and e-mail  |
| Bookkeeping  | Article 6 paragraph 1 lit. c) Regulations of the GDPR in connection with from art. 74 par. 2 of the Accounting Act, ie from 30 January 2018 (Journal of Laws of 2018, item 395) The data is stored for a period required by law requiring the Administrator to store accounting books (5 years, counting from the beginning of the year following the financial year for which the data pertain).  | First name and last name; address of residence / business activity / registered office (if different from the delivery address), company name and tax identification number (NIP) of the Customer or Customer  |
| Establishment, investigation or defense of claims that may be raised by the Administrator or which may be raised against the Administrator  | Article 6 paragraph 1 lit. f) Regulations of the GDPR The data is stored for the duration of the legitimate interest pursued by the Administrator, but no longer than during the period of limitation of claims against the data subject, due to the business activity conducted by the Administrator. The limitation period is defined by law, in particular the Civil Code (the basic period of limitation for claims related to running a business is three years, and for a contract of sale two years).  | First name and last name; contact phone number; e-mail address; delivery address (street, house number, apartment number, zip code, city, country), address of residence / business / seat (if different from delivery address). In the case of Clients or Customers who are not consumers, the Administrator may additionally process the company's name and tax identification number (NIP) of the Customer or the Customer.  |

**4)   DATA RECEIVERS ON THE WEBSITE**

1.         For the proper functioning of the Website , including for the implementation of Sales Agreements concluded, it is necessary for the Administrator to use the services of external entities (such as, for example, software provider, payment service provider). The administrator uses only the services of such processors who provide sufficient guarantees to implement the appropriate technical and organizational measures, so that the processing meets the requirements of the GDPR Regulation and protects the rights of the data subjects.

2.         The transfer of data by the Administrator is not in each case and not to all indicated in the privacy policy of recipients or categories of recipients - the administrator provides data only when it is necessary for the purpose of processing personal data and only to the extent necessary to achieve it.

3.         Personal data may be transferred by the Administrator to a third country, whereby the Administrator assures that in such a case it will take place in relation to the state providing an adequate level of protection - compliant with the Regulation of the GDPR, and the data subject has the opportunity to obtain a copy of his data. The administrator transfers collected personal data only in the case and to the extent necessary to achieve a given purpose of data processing in accordance with this privacy policy .

4.         The personal data of the Service Users and Clients of the Website may be transferred to the following recipients or categories of recipients:

and.         **hauliers / forwarders / courier brokers** - in the case of a Customer who uses the Online Store with the method of delivery of the Product by post or courier, the Administrator provides the Customer's collected personal data to the selected carrier, forwarder or agent performing the shipment on behalf of the Administrator to the extent necessary to complete the delivery of the Product the customer

b.        **entities handling electronic payments or payment cards** - in the case of a Customer who uses the electronic payment method or payment card on the Website, the Administrator provides the Customer's personal data collected to a selected entity servicing the above payments on the Website on behalf of the Administrator to the extent necessary to handle payments made by the Customer .

c.         **service providers supplying the Administrator with technical, IT and organizational solutions enabling the Administrator to conduct business** , including the Website and Electronic Services provided through it (in particular a computer software provider to run an Internet Service, an e-mail and hosting provider and a management software provider) company and providing technical assistance to the Administrator) - the Administrator provides the collected personal data of the Customer to a selected supplier acting on his behalf only in the case and to the extent necessary to achieve a given purpose of data processing in accordance with this privacy policy.

d.        **providers of accounting, legal and advisory services** providing the Administrator with accounting, legal or advisory support (in particular an accounting office, law firm or debt collection company) - The administrator provides the collected personal data of the client to a selected supplier acting on his behalf only in the case and to the extent necessary to carry out the given the purpose of data processing in accordance with this privacy policy .

**5)   PROFILING ON THE WEBSITE**

1.         The RODO Regulation imposes on the Administrator an obligation to inform about automated decision-making, including profiling referred to in art. 22 ust. 1 and 4 of the Regulation of the GDPR , and - at least in these cases - relevant information about the rules for their adoption, as well as the significance and envisaged consequences of such processing for the data subject. With this in mind, the Administrator provides information on possible profiling in this section of the privacy policy.

2.         The Administrator may use profiling for the purposes of direct marketing on the Website , but the decisions made on the basis of it by the Administrator do not concern the conclusion or refusal to conclude a Sales Agreement or the possibility of using Electronic Services on the Website.

3.         Profiling on the Website is based on an automatic analysis or forecast of a given person's behavior on the Website , or through analysis of the previous history of activities undertaken on the Website. The condition of such profiling is the Administrator having personal data of a given person in order to be able to send it, eg a rebate code.

4.         The data subject has the right not to be subject to a decision which is based solely on automated processing, including profiling, and has legal effects or substantially affects the person .

**6)   THE RIGHT OF A PERSON WHO THE DATA CONCERNS**

1.         **The right of access, rectification, contain, remove or transfer** - the data subject has the right to request from A dministratora access to their personal data, rectification, erasure ( "right to be forgotten") or processing limitations, and no rights about to bring opposition to processing, and has the right to transfer your data . Detailed conditions for the exercise of the abovementioned rights are indicated in art. 15-21 of the GDPR Regulation.

2.         **The right to withdraw consent at any time** - the person whose data are processed by the Administrator on the basis of their consent (pursuant to Article 6 (1) a) or Article 9 par. 2 lit. a) Regulation of the GDPR), it has the right to withdraw consent at any time without affecting the legality of the processing, which was made on the basis of consent before its withdrawal .

3.         **The right to lodge a complaint to the supervisory body** - a person whose data is processed by the Administrator, has the right to lodge a complaint to the supervisory body in the manner and mode specified in the provisions of the Regulation of the GDPR and Polish law, in particular the Act on the Protection of Personal Data. The supervisory body in Poland is the President of the Office for Personal Data Protection .

4.         **The right to object** - the data to which it relates has the right to object at any time - for reasons related to its special situation - to the processing of personal data relating to it based on art. 6 par. 1 lit. e) (public interest or tasks) or f) (legitimate interest of the administrator) , including profiling based on these provisions. In such a case, the administrator may no longer process such personal data unless he demonstrates the existence of valid legally valid grounds for processing that override the interests, rights and freedoms of the data subject, or the grounds for determining, investigating or defending claims.

5.         **The right to object dot. Direct marketing -** **j** f the personal data are processed for the purposes of direct marketing, the data subject has the right at any time to object to the processing of their personal data for the purposes of such marketing, including profiling, in the field, in which the processing is related to such direct marketing.

6.         In order to exercise the rights referred to in this point of the privacy policy, you can contact the Administrator by sending a relevant message in writing or by e-mail to the Administrator's address indicated at the beginning of the privacy policy or using the contact form available on the Website.

**7)   COOKIES ON THE WEBSITE, OPERATIONAL DATA AND ANALYSIS**

1.         Cookies (cookies) are small text information in the form of text files, sent by the server and stored on the side of the visitor of the Website (eg. On your hard drive, laptop, or on the memory card smartphone - depending on what device you use visiting our Website). Detailed information about cookies as well as the history of their creation can be found among others here: http://en.wikipedia.org/wiki/City.

2.         The Administrator may process data contained in Cookies when users use the Website for the following purposes:

and.         identification of the Registered Users as logged in to the Website and showing that they are logged in;

b.        keeping anonymous statistics showing how to use the Website website;

3.         By default, most web browsers available on the market accept cookies by default . Everyone has the possibility to define the terms of using cookies using the own browser's settings. This means that you can eg. Partially reduce (eg. Time) or completely disable the ability to save files Cookies - in the latter case, however, it may have some impact on the functionality of the Website

4.         Browser settings in the scope of cookies are important from the point of view of consent to the use of cookies by our Website - in accordance with the law, such consent can also be expressed through the settings of the web browser. In the absence of such consent, the browser's settings in the field of cookies should be changed accordingly .

5.         Detailed information on changing cookies settings and their self-removal in the most popular web browsers are available in the help section of the web browser and on the following pages (just click on the link):

[in the Chrome browser](https://translate.google.com/translate?hl=pl&prev=_t&sl=pl&tl=en&u=http://support.google.com/chrome/bin/answer.py%3Fhl%3Dpl%26answer%3D95647)

[in the Firefox browser](https://translate.google.com/translate?hl=pl&prev=_t&sl=pl&tl=en&u=http://support.mozilla.org/pl/kb/W%25C5%2582%25C4%2585czanie%2520i%2520wy%25C5%2582%25C4%2585czanie%2520obs%25C5%2582ugi%2520ciasteczek)

[Internet Explorer](https://translate.google.com/translate?hl=pl&prev=_t&sl=pl&tl=en&u=https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies)

[in the Opera browser](https://translate.google.com/translate?hl=pl&prev=_t&sl=pl&tl=en&u=http://help.opera.com/Windows/12.10/pl/cookies.html)

[in the Safari browser](https://translate.google.com/translate?hl=pl&prev=_t&sl=pl&tl=en&u=http://support.apple.com/kb/PH5042)

[in the Microsoft Edge browser](https://translate.google.com/translate?hl=pl&prev=_t&sl=pl&tl=en&u=http://windows.microsoft.com/pl-pl/windows-10/edge-privacy-faq)

6.         The Administrator may use on the Website the services of Google Analytics, Universal Analytics provided by Google Inc. (1600 Amphitheater Parkway , Mountain View , CA 94043, USA. These services help the Administrator analyze traffic on the Website. The data collected is processed as part of the above services in an anonymised way (these are the so-called operating data that prevent the person from being identified) to generate statistics helpful in administering the Website. These data are aggregate and anonymous in nature, i.e. they do not contain identification features (personal data) of persons visiting the Website. Administrator using the above services on the Website collects such data as the source and medium of obtaining visitors to the Website and the manner of their preservation on the Website, information on devices and browsers from which they visit the website, IP and domain, geographic data and demographic data (age , sex) and interests.

7.         It is possible to easily block information about its activity on the Website website by a given person by providing Google Analytics - you can install a browser plug-in provided by Google Inc. for this purpose. available here: https://tools.google.com/dlpage/gaoptout?hl=en.

**8)   FINAL PROVISIONS**

1. The Website may contain links to other websites. The administrator urges that after going to other websites, read the privacy policy established there. This privacy policy applies only to the Website Administrator.

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