

Privacy Policy

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Privacy Policy – introduction

This Privacy Policy is applicable to the processing of personal data, the controller of which is Stalexport Autostrada Małopolska S.A. (hereinafter: SAM S.A.) with its registered office in Mysłowice, collected via the website www.autostrada-a4.com.pl and www.a4go.pl (also referred to as the Website for Customers) and personal data processed in connection with business activity of SAM S.A. and concerning the following categories of persons:

- personal data of persons using the toll section of the A4 Katowice- Kraków motorway;
- personal data of customers and suppliers with whom contracts are concluded;
- personal data of persons authorised to represent the customer/supplier and persons to be contacted in matters related to execution or performance of a contract;
- personal data of persons to whom the newsletter service is rendered;
- personal data of persons who contact SAM S.A. on an unsolicited basis.

How to contact us?

If you have any questions about this document or the processing of your personal data, and you would like to exercise any of your rights as a personal data subject, please contact us as indicated below. Please see below for more information on exercising your rights as a data subject whose personal data is being processed.

Contact details of the data controller:

STALEXPORT AUTOSTRADA MAŁOPOLSKA S.A. with its registered office in Mysłowice

41-404 Mysłowice, ul. Piaskowa 20,

NIP (taxpayer identification number) 6342262054, REGON (National Business Registry Number) 273796214,

registered with the District Court for Katowice – Wschód in Katowice, 8th Commercial Division of the National Court Register under KRS number 000026895, share capital of PLN 66,753,000,

e-mail: a4@autostrada-a4.com.pl

phone: +48 32 76 27 555

Contact data of data protection officer appointed by SAM S.A.:

Katarzyna Wojtaszyn

e-mail: inspektor@autostrada-a4.com.pl

41-404 Mysłowice, ul. Piaskowa 20,

phone: +48 32 76 27 512

Rights of personal data subjects

The rights of personal data subjects shall be set forth in Article 7 and 15-21 of 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 (hereinafter: "GDPR") and the Act of 10 May 2018 on Personal Data Protection (hereinafter: the Act).

Each person whose personal data is processed shall have the right to:

- access their personal data and obtain a copy thereof – in accordance with and to the extent indicated in Article 15 of GDPR;
- rectify their personal data in the event that the processed personal data is incorrect or out of date, and to request their incomplete personal data be completed – in accordance with and in the cases indicated in Article 16 of GDPR;
- erase their personal data in the event of the conditions referred to in Article 17 of GDPR, for example when personal data are no longer necessary for the purposes for which they were collected or otherwise processed. The right to erase personal data shall not apply in the cases referred to in Article 17(3) of GDPR. This means that if any of the grounds referred to in this paragraph arise, e.g. the processing of personal data is necessary to fulfil a legal obligation or to establish, assert or defend claims, despite the submitted request, we will not be able to erase the personal data despite your request;
- restrict the processing of personal data in the cases indicated in Article 18 of GDPR;
- transfer data – in accordance with Article 20 of GDPR – each person whose personal data is processed on the basis of consent or contract, and if the data is processed by automated means has the right to obtain their personal data in a structured, commonly used machine-readable format and request their transfer to another controller;
- object at any time to the processing of their personal data on grounds relating to a particular situation, when the processing is necessary for the purposes of the legitimate interests, i.e. under Article 6(1)(f) of GDPR.

Pursuant to Article 21 of GDPR, once an objection has been lodged, the Controller shall no longer be permitted to process the personal data, unless the controller can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of claims;

- to not be subject to a decision which is based solely on automated processing, including profiling, and which produces legal effects concerning the data subject or significantly affects them in a similar manner – Article 22 of GDPR;

- object at any time to the processing of personal data for the purposes of direct marketing, including profiling – Article 21 of GDPR;

- withdraw the consent to the processing of personal data at any time. Pursuant to Article 7(3) of GDPR, the withdrawal of consent shall not affect the lawfulness of processing performed on the basis of the consent prior to its withdrawal.

To exercise any of the above-mentioned rights, please contact the data protection officer appointed at the company (e-mail: inspektor@autostrada-a4.com.pl) or by traditional mail sent to the registered office of the Company: 41-404 Mysłowice, ul. Piaskowa 20. Feel free to contact the data protection officer by phone at +48 32 76 27 512 if you have any concerns or questions relating to the processing of your personal data.

Each person whose personal data is being processed shall also have the right to lodge a complaint with a supervisory authority if he/she believes that the Company is processing his/her personal data contrary to the applicable law. In Poland, the supervisory authority is the President of the Personal Data Protection Office. The seat of the Personal Data Protection Office is located at the following address: ul. Stawki 2, 00-193 Warszawa. For more information on how to lodge a complaint to the supervisory authority, please visit www.uodo.gov.pl.

The processing of your personal data and their protection is particularly important to us. We are determined that any doubts that arise in connection with their processing are immediately resolved. Therefore, we would be grateful if, before making any complaint to the supervisory authority, you would like to contact the data protection officer appointed by us in order to immediately address your doubts as to the lawful processing of your personal data.

Definitions

The terms used in the Privacy Policy are given the following meaning:

Service Provider – an entity within the meaning of the Act of 18 July 2002 on Providing Services by Electronic Means, SAM S.A. in this case;

Data Controller – an entity within the meaning of Article 4(7) of GDPR, SAM S.A. in this case;

Customer – an entity within the meaning of the Act of 18 July 2020 on Providing Services by Electronic Means (hereinafter also referred to as the Client).

Data collection via the websites www.autostrada-a4.com.pl and www.a4go.pl

The terms and conditions for provision of services by electronic means and collection of personal data in connection with their provision

By browsing our websites you may use the following services provided by electronic means within the meaning of the Act of 18 July 2002 on Providing Services by Electronic Means (consolidated text: Dz. U. [Polish Journal of Laws] of 2020, item 344):

www.autostrada-a4.com.pl

- 1) free-of-charge access to news and information on fees and methods of their payment, security and campaigns;
- 2) access to contact data of SAM S.A., data related to the activities of SAM S.A. as a concessionaire;
- 3) free-of-charge use of the Travel Planner services;
- 4) free-of-charge access to and download of documents;
- 5) free-of-charge access to the photo gallery of the motorway;

www.a4go.pl

- 1) access to contact data of SAM S.A.;
- 2) free-of-charge access to news and information on products;
- 3) Customer Account – a service consisting in providing the Customer with space on the Customer Website in accordance with this Privacy Policy as well as the Rules and Regulations for remote purchase and use of “A4Go” on-board units and “KartA4” proximity cards, if the Customer purchases products or makes transactions involving the purchase Credits authorising them to use the A4 motorway managed by SAM S.A., providing access to information stored therein and making purchases. The Customer accesses his/her account using his/her login (e-mail address) and password. The Customer logs into the Account after the registration at the Customer Website.
- 4) Balance check – a service consisting in checking the current balance on the A4Go/Card device. The balance is checked by entering the number of A4Go OBU or Card and PIN number.

Article 6(1)(b) of GDPR in conjunction with the Act of 18 July 2020 on Providing Services by Electronic Means is the legal basis for the processing of personal data in connection with the provision of electronic services.

The provisions of the Regulations for remote purchase and use of “A4Go” on-board units and “KartA4” proximity cards, https://www.autostrada-a4.com.pl/oplaty/regulamin_zakupu (hereinafter: the Regulations), shall additionally apply to the products purchased in the sales channel – an online store available at www.a4go.pl. A person viewing the www.a4go.pl website does not need to have a registered account. To the extent that the provision of the service requires the provision of personal data, such provision is voluntary but necessary for the provision of the service. Without providing personal data the service cannot be provided.

The conclusion of the agreement for the provision of services by electronic means takes place when the Customer starts using a given service. The use of services takes place in accordance with this Privacy Policy and pursuant to applicable legislation and the Regulations, if it is additionally applicable to a particular service provided by electronic means.

The use of the services involves the transmission of data via the public Internet network, and is therefore subject to the risks inherent in the Internet, such as infection with dangerous software.

The use of the websites and the provision of services by electronic means requires the following technical requirements to be met by the Customer: access to a device such as a computer, laptop, phone or other multimedia device with Internet access and an Internet browser, enabling cookies in the web browser.

By using the services, the Customer is prohibited to provide any unlawful content, to violate the personal interests of third parties, generally accepted social standards and to take actions that may cause disruptions or damage to the ICT systems of the Service Provider or other entities involved in any way in the provision of services by electronic means. The Service Provider shall not be liable for technical problems resulting from the malfunction of the Client’s equipment, or for the lack of appropriate parameters enabling the collection of data.

The Customer may terminate the use of a given service provided by electronic means at any time. Depending on its type and nature, the service may be terminated, for example, by leaving the website.

The Service Provider has the right to block access to the website or websites in whole or in part for important reasons, as well as to make changes to the data contained in the websites, change the technical parameters of websites, temporarily or permanently limit the availability of the website or websites.

The Customer is obliged to read this Privacy Policy before using the services. Use of the services shall mean acceptance of the provisions of the Privacy Policy.

The content posted on the websites is protected by copyright and intellectual property law. None of these contents, in particular such as text, logos, icons, photographs, graphics presented at the website cannot be reproduced or distributed without prior consent in any form and manner.

The Customer has the right to lodge a complaint regarding services provided by electronic means. Complaints must be submitted in writing by registered mail to the address of the registered office of the Service Provider. The Service Provider shall inform the complainant in writing or electronically at the address provided by the complainant, if any, within 14 days of receiving the complaint.

Cookie files

Our websites available at www.autostrada-a4.com.pl and www.a4go.pl use cookies.

Some data may be collected automatically. Pursuant to the law, the Service Provider may process data characterising the use of services provided by electronic means by the Client, such as designations identifying the Client, designations identifying the end of the ICT system used by the Client, information about the beginning, end and scope of each use of services provided by electronic means, information about the use of services provided by electronic means by the Client. More information on how cookies work can be found at <http://www.allaboutcookies.org>.

Cookie files (commonly referred to as: cookies) small files which are stored by websites on the device of a person who visits such a website. These files contain various information that are often essential for a website to function properly. We use several categories of cookies on our websites, such as:

essential cookies, which, as their name suggests, are necessary for the website to function. The user cannot decide on whether to install them;

preference cookies, which enable the website to remember information about the user's preferences with regard to displaying the website, e.g. the language version selected;

statistical cookies, which help website owners better understand how persons using the websites interact with them;

advertising cookies, which allows us to provide you with more tailored advertising, including from third party advertisers.

The table below presents all types of cookie files used on our websites.

	www.autostrada-a4.com.pl	www.a4go.pl
Essential cookies	ci_session (1 day) csrf_cookie_name (1 day)	AspNetCore.Identity.Application idsrv.session AspNetCore.Antiforgery.w5W7x28NAIs
Preference cookies	-	-
Statistical cookies	ga (2 years) _gat (1 day) _gid (1 day) _collect (session)	ai_user (1 year)
Advertising cookies	-	-
Unclassified cookies	-	basket (permanent)
Cookies collecting information about errors		al_buffer (session) al_sentBuffer (session)

In this context, we may store the following data about:

- the device you use to browse the website, in particular www.a4go.pl:

operating system version, unique identifier, IP, User Agent;

- the location: IP;

- login: Internet Protocol (IP) address of the device, operating system information, login information - date of registration, date of last password change, browser type and type (for all requests).

Pursuant to the applicable law (Article 173 of the Telecommunications Law), the storage of information or access to information already stored on your telecommunications terminal equipment is permitted, provided that you have given your consent. Consent to the use of cookies by the website may be given by means of the software settings installed on the telecommunications terminal equipment used by you.

If you do not wish to have cookies installed and stored on your device, simply change the settings of the web browser you use to view our websites. Furthermore, even if such cookies have previously been stored on your device, you can delete them at any time – every web browser provides this functionality. Please check your browser settings and adjust them to your needs and preferences. Below you may find some links where you will find information on how to delete cookies from your device from specific web browsers:

Mozilla

<https://support.mozilla.org/pl/kb/usuwanie-ciasteczek-i-danych-stron-firefox?redirectlocale=pl&redirectslug=usuwanie-ciasteczek>

Google Chrome

<https://support.google.com/accounts/answer/32050?co=GENIE.Platform%3DDesktop&hl=pl>

Opera

<https://help.opera.com/pl/latest/web-preferences/>

Internet Explorer

<https://support.microsoft.com/pl-pl/help/278835/how-to-delete-cookie-files-in-internet-explorer>

Please note that disabling all or some cookies may have an impact on the convenience of using the website, including its browsing.

The Controller does not take action to adjust the content of websites operated by them on their own in terms of prior behaviour of the Customer – this means that advertisements, the type of which would be the result of prior analysis of your activity on our website or other websites, will not be displayed to you on our websites.

We have integrated social media buttons on our websites - Facebook, Twitter, YouTube. By clicking on any of these buttons you will be redirected to our page we have on the given social networking site. Your further browsing of the page of a specific social network is exclusively subject to the data privacy policy of the website to which you have been redirected. Neither we have any influence on nor we are responsible for the type of data collected by these websites. We recommend that you read the privacy policies published at these websites.

Below you will find an example of how you can set cookies in connection with the use of Twitter components on our websites.

Twitter is a service rendered by Twitter Inc. with its registered office in the U.S. Each time our websites receive requests, this component asks the browser you use to download this component. In this way, Twitter is informed precisely which subpages you are viewing. We have no control over what data is collected by Twitter. You can find more information on personal data collected by Twitter in their privacy policy available at www.twitter.com/privacy.

If you do not wish Twitter to collect any of your data, you should change the settings in your Twitter account by doing so at www.twitter.com/account/settings.

Our website – www.autostrada-a4.com.pl – uses the Google Analytics service for analysing website traffic, which is provided by Google Inc. (hereinafter: Google). As part of this service, Google Analytics uses cookies which are placed on your device to enable us, as the Controller, to analyse how you use the website. The information generated by the cookie about your use of the website will be transferred to Google. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The data obtained by Google may be transmitted to third parties where they process such information on Google's behalf or where such transmission is required by law. To disable Google Analytics, you need to install a free browser add-on that **blocks Google Analytics** – you will find a link to this add-on below.

<https://tools.google.com/dlpage/gaoptout?hl=pl>

The legal basis for the processing of personal data (provided by cookies) is our legitimate interest, which is to carry out activities related to the analytics of the use of websites for business purposes, including ensuring their correct display, display in accordance with preferences, analysis of the security and stability of the system, i.e. Article 6(1)(f) of GDPR, and Article 6(1)(b) of GDPR as far as essential cookies are concerned.

When data is transferred outside the EU to the United States, such data transfer is subject to the conditions set out in the EU-US Privacy Shield Frameworks (www.privacyshield.gov).

Data Recipients: Only entities that provide services to our Company that are relevant to the processing of personal data for the above purposes can become recipients of your personal data. These entities fall to the following categories in particular: IT service providers, data protection officer. Each data recipient shall obtain only those personal data which are necessary for the performance of a specific service related to the above purposes, and shall be obliged to process and protect them in accordance with the applicable legal provisions.

Personal data may be made available to state authorities for ongoing proceedings in accordance with the law.

Information about your rights in relation to the processing of your personal data can be found in the section: [Rights of personal data subjects](#)

Processing of personal data of customers and suppliers with whom contracts are concluded

If you enter into a contract with us because, for example, you order an on-board A4Go unit, supply us (provide us with) specific services necessary for our business, or enter into tenders organised by us for the selection of a contractor for specific services, we may process your personal data as Customers or Suppliers to the extent necessary for the conclusion and performance of the contract and to take action, at your request, prior to entering into the contract (Article 6(1)(b) of GDPR).

When entering into a contract with you, you will be asked to provide specific personal data that is necessary to enter into the contract. The provision of data is voluntary, but it is necessary for the contract to be concluded.

Data collected in connection with the conclusion and performance of a contract will be processed for the period during which actions are taken prior to the conclusion of the contract, and when a contract is concluded, for the duration of the contract.

The Regulations for remote purchase and use of "A4Go" on-board units and "KartA4" proximity cards (https://www.autostrada-a4.com.pl/oplaty/regulamin_zakupu) and the Regulations for purchase of on-board "A4Go" units and "KartA4" proximity cards at the Customer Service Points and use thereof shall be applicable to the extent that you, as our Customer, purchase our products at Customer Service Points or at the Customer Website.

Data collected in connection with the conclusion of a contract will also be processed:

- in order to comply with a legal obligation to which SAM S.A. as a controller is subject (Article 6(1)(c) of GDPR), including in particular accounting and tax obligations. The processing of personal data for the purpose of complying with legal obligations means that wherever universally applicable legal regulations impose a specific obligation on the controller relating to the processing of personal data, such data shall be processed until such obligation is fulfilled.

- for the purposes of the legitimate interests pursued by the controller (Article 6(1)(f) of GDPR), such as:

- archiving documents for the purpose of demonstrating due performance of legal obligations and commitments under concluded contracts and possibility of establishing, asserting claims or defending against specific claims directed at the Company. The data will be processed until the expiration of the period of limitation of claims, and in the case of legal proceedings or any other proceedings conducted by state authorities – until their final conclusion;
- developing various types of analyses and reports for internal business purposes, in connection with the activities conducted, including those within the Stalexport Autostrada Capital Group, as well as in connection with reporting for the Atlantia Capital Group, to which SAM S.A. belongs – the data will be processed for no longer than it is necessary for the purpose, including the term of the contract;
- taking actions to ensure compliance with legal standards and ethics – the data will be processed for the term of the contract;
- conducting direct marketing, unless separate legal regulations require obtaining additional consent – the data will be processed for the term of the contract and if the marketing was conducted based on the consent until withdrawal of such consent;
- improving the quality of the services and products offered – the data shall be processed until this purpose is achieved but no longer than for the terms of the contract concluded.

Data Recipients. Only entities that provide services to our Company that are relevant to the processing of personal data for the above purposes can become recipients of your personal data. These entities fall to the following categories in particular: providers of postal and courier services, legal and consulting services, IT services, document archiving services. Each data recipient shall obtain only those personal data which are necessary for the performance of a specific service related to the above purposes, and shall be obliged to process and protect them in accordance with the applicable legal provisions.

Your personal data may also be made available to public authorities as part of a specific proceeding conducted under generally applicable law.

Information about your rights in relation to the processing of your personal data can be found in the section: [Rights of personal data subjects](#).

Processing of personal data of persons authorised to represent the customer/supplier and persons to be contacted in matters related to execution or performance of a contract

When concluding or performing contracts, personal data of natural persons other than customers or suppliers, e.g. members of the Management Board, proxies, employees, co-workers, may be processed. This is due to the fact that very often the parties need to agree on the details of the conclusion or performance of the contract in order to conclude or perform it and they usually do so with participation of these persons. The legal basis for processing personal data of this category is our legitimate interest (Article 6(1)(f) of GDPR), i.e.:

- to carry out communications for the purpose of performing contracts concluded or entered into. In this respect, the data will be processed for the terms of the contract or to conduct pre-contractual activities;
- to establish, assert and defend claims. The data will be processed until the expiration of the period of limitation of claims, and in the case of legal proceedings or any other proceedings conducted by state authorities – until their final conclusion.

We process your data because we may have received it from a client/supplier with whom you work and who you are authorised to represent, or we may have received it directly from you. The scope of the processed data

always depends on the type of contact and your role, e.g. the data of a proxy who represents the client/supplier may be different, and the scope of data of an employee with whom we settle on e.g. details of a deadline for performing specific actions – as a rule, these are your business data, such as your name, surname, business telephone number, e-mail address, and thus data we need in order to communicate with you.

Data Recipients. Only be entities that provide services to our Company that are intended to support the aforementioned purposes of processing may be recipients of your personal data, e.g. a law firm, a data protection officer, providers of IT services that we use to process personal data (e.g. for sending e-mails), postal service providers through which we will attempt to deliver correspondence to you if necessary. Your personal data may also be made available to state authorities for the purpose of their proceedings conducted under generally applicable law.

Information about your rights in relation to the processing of your personal data can be found in the section: [Rights of personal data subjects.](#)

Processing of personal data of persons to whom the newsletter service is rendered

The newsletter service consists in sending by e-mail, from time to time, marketing and commercial information related to the business of SAM S.A., including products and services offered by SAM S.A., promotions, etc. The consent referred to in Article 10 of the Act of 18 July 2002 on Providing Services by Electronic Means and Article 172 of the Telecommunications Law of 16 July 2004 are the legal grounds for personal data processing.

The service is provided only to persons who voluntarily expressed their wish to receive such information at the e-mail address provided by them. Consent may be withdrawn at any time. Such withdrawal of the consent will not affect the lawfulness of processing based on consent before its withdrawal. How to withdraw the consent? You can do this in several manners:

- by clicking an appropriate link that is included in every newsletter message we send;
- by submitting such a request at one of our Customer Service Centres in Mysłowice or Balice;
- by sending a written request to the Company's registered address;
- by sending a request by e-mail to the e-mail address of the DPO;
- by unchecking the relevant checkbox in the panel of the Customer Account at the Website (this applies only to persons who have an Account at the Website for Customers).

Personal data will be processed until consent is withdrawn or until the purpose is fulfilled.

To the extent that it is necessary to establish, assert or defend claims – personal data may also be processed on the basis of our legitimate interest (Article 6(1)(f) of GDPR), until the expiry of the limitation period for claims made in connection with or as a result of the service provided or until the end of proceedings initiated under applicable law. Provision of data for the purposes of the service is voluntary, but necessary to receive such a newsletter. Without your e-mail address, we will simply not be able to send you the newsletter.

Data Recipients. Only entities that provide services to our Company that are relevant to the processing of personal data for the above purposes can become recipients of your personal data. These entities fall to the following categories in particular: providers of services through which the newsletter is sent, IT services, including website maintenance, legal and advisory services.

Your personal data may also be made available to public authorities as part of a specific proceeding conducted under generally applicable law.

Information about your rights in relation to the processing of your personal data can be found in the section:

[Rights of personal data subjects.](#)

Processing of personal data of persons using the toll section of the A4 Katowice-Kraków motorway

Some of your personal data may also be processed, when you use the toll section of the A4 motorway Katowice-Kraków that is operated by us. In particular, this concerns data which may be recorded by cameras being a part of the video surveillance system installed at specific points along the entire length of the operated section. When you are within the range of cameras, data such as the type of vehicle (vehicle category) you are driving, your registration number and your image may be recorded. The legal basis for maintaining the video surveillance system is:

the legitimate interests referred to in Article 6(1)(f) of GDPR, being to ensure proper process of toll collection on the toll section of the motorway and to protect the property, and to establish, assert and defend claims made in connection with toll collection or the occurrence of an event on the basis of which such claims may be made.

The data will be processed no longer than necessary, i.e. for a maximum period of 3 months. Data may be kept for an extended time if it is necessary to keep them under other legal regulations.

Data Recipients. Only entities that provide services to our Company that are relevant to the processing of personal data for the above purposes can become recipients of your personal data. These entities fall to the following categories in particular: IT service providers, IT service providers involved in the maintenance of the systems by means of which the monitoring is carried out, the motorway operator to the extent necessary for the collection of motorway tolls and the maintenance of the motorway, a law firm, the data protection officer to the extent necessary for the performance of their statutory tasks.

Your personal data may also be made available to public authorities as part of a specific proceeding conducted under generally applicable law.

Information about your rights in relation to the processing of your personal data can be found in the section: [Rights of personal data subjects.](#)

Processing of personal data of persons who contact SAM S.A. on an unsolicited basis

If you send correspondence to SAM S.A. by e-mail or post, your personal data, such as your name, surname, address, e-mail address or telephone number, will be processed by our company in order to ensure ongoing contact with you as part of our business, i.e. under Article 6(1)(f) of GDPR. When addressing any correspondence to us, it is you who decide what data you provide us with. It is voluntary to provide such data. The consequence of failing to provide specific data may simply be that we are unable to take specific action on the matter for which such correspondence is addressed, or that we are unable to provide feedback on how your matter is handled in the event that your correspondence contains no address. The data will be processed until the matter in connection with which such correspondence is sent is concluded and no longer than it results from other legitimate interests of the Company, such as to establish, assert and defend claims to which the correspondence pertains – in such case personal data may be processed until the expiry of the limitation period for claims or until the matter is lawfully and finally concluded if it has been initiated under applicable law.

Data Recipients

The companies that provide us with services in connection with our business as part of which personal data is processed may be data recipients. These entities fall to the following categories in particular: postal operator or companies providing postal services, insofar as this is necessary for the delivery of correspondence, the hosting provider, insofar as access to e-mail in our domain is concerned, the data protection officer, insofar as this is

necessary for the performance of his tasks referred to in GDPR.

Information about your rights in relation to the processing of your personal data can be found in the section: [Rights of personal data subjects.](#)

Transfer of data outside the EU

Personal data shall be transferred outside the EU or EEA, but only to the extent necessary (e-mail address) to send marketing and commercial messages to persons who have consented to this. We use a tool - provided by Twilio - that stores personal data on servers located in third countries, in particular in the USA. The provider of this tool guarantees an adequate level of protection of personal data through the applicable compliance mechanisms envisaged in GDPR, in particular by joining the Privacy Shield Programme. For more information about Twilio's privacy mechanisms visit [https://www.twilio.com/legal/data-protection-addendum.](https://www.twilio.com/legal/data-protection-addendum)

Other personal data is not transferred outside the EU/EEA.

Provision of personal data

It is voluntary to provide personal data. Insofar as the processing of personal data is related to the conclusion of a contract - the provision of data is a condition for the conclusion of the contract. This means that the contract cannot be concluded without providing personal data. In other cases, failure to provide all or some of your personal data may make it impossible for us to undertake certain activities.

Final provisions

The Controller shall have the right to amend this Privacy Policy in whole or in part at any time. Any amendments will be published at the websites on an ongoing basis.

This Privacy Policy is effective from 23 June 2020.