

## **New Privacy and Cookies Policy effective 17/09/2024**

*In fulfillment of the information obligation imposed by Article 13. Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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), the Data Controller hereby informs:*

1. This Privacy Policy (hereinafter referred to as the "**Policy**") is addressed to users who use the website available at the domain: [www.kompleks.pl](http://www.kompleks.pl) (hereinafter referred to as the "**Website**") and specifies the type, scope, uses and security of personal data. The policy is for informational purposes.
2. The administrator of personal data obtained from users using the Website is the company under the firm Grupa Konsultingowo-Inżynieryjna KOMPLEKS S.A. with its registered office at: Ogródowa 19, 58-306 Wałbrzych, entered in the Register of Entrepreneurs of the National Court Register by the District Court for Wrocław-Fabryczna in Wrocław, IX Economic Department of the National Court Register under the KRS number 0000369499, with a share capital of PLN 623,458.80 fully paid up, NIP: 886-000-33-38, REGON 891500422.
3. The Website user, when contacting the Personal Data Administrator (by email, telephone or contact form) - provides the Personal Data Administrator with his/her personal data (name, email address, telephone number, IP address of the computer used by the Website user, possibly company name).
4. Purposes and activities of personal data processing: When contacting by e-mail, telephone, or using the contact form available on the Website, the user provides the Administrator with his/her e-mail address as the address of the sender of the message, as well as his/her name and surname, and contact telephone number, possibly the name of the user's company. Provision of data is voluntary, but necessary for the Data Controller to make contact with the Website user. In this case, the user's data is processed by the Personal Data Administrator for the purpose of contacting the user, and the basis for processing is Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016. on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (General Data Protection Regulation) (hereinafter the "**GDPR Regulation**"), i.e. taking action by the Personal Data Controller at the user's request, prior to concluding a contract for the sale of products offered by the Personal Data Controller. The legal basis for processing your data after the end of contact is the legitimate purpose of archiving your correspondence for future demonstration (Article 6(1)(f) of the GDPR Regulation). The content of the correspondence may be subject to archiving and the Data Controller, however, is not able to clearly determine when the correspondence will be deleted. A Website user has the right to request the history of correspondence he or she has had with the Personal Data Controller (if archived), as well as to request its deletion, unless its archiving is justified due to an overriding interest of the Personal Data Controller, such as defense against potential claims by a Website user.
5. The Data Controller informs that the user of the Website has, at any time, the right of data portability referred to in Article 20 of the GDPR Regulation, the right of access to the content of personal data and the possibility to correct, rectify, object to the processing of data, and the consent granted for the processing of data may be withdrawn by the User at any time. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal. The data controller may refuse to delete your personal data if there are grounds under the law. The user also has the right to lodge a complaint about the processing of personal data to the President of the Office for Personal Data Protection. The Website users' data will not be subject to automated decision-making, including profiling. Personal data is not transferred outside the European Economic Area.
6. The rules related to the exercise of the indicated rights of the User are described in detail in Articles 15 - 21 of the GDPR Regulation:
  - a. The right to delete data - the so-called "right to be forgotten" (Article 17 of the GDPR Regulation): User have the right to request the deletion of all or some of your personal data if:
    - (a) personal data are no longer necessary for the purposes for which they were collected or for which they were processed,
    - (b) personal data is processed unlawfully,
    - (c) personal data must be deleted in order to comply with a legal obligation under European Union law or the law of a Member State to which the Controller is subject,
    - (d) personal data was collected in connection with offering information society services. Despite a request for erasure of personal data, due to the filing of an objection, the Controller may retain certain personal data to the extent that the processing is necessary to establish, assert or defend claims, as well as to comply with a legal obligation requiring processing under the law. This applies in particular to personal data including: name,

surname, e-mail address, which data are retained for the purpose of handling complaints and claims related to the use of the services of the Personal Data Controller.

b. The right to restrict data processing (Article 18 of the GDPR Regulation): User have the right to request a restriction of the processing of his personal data. The submission of a request, pending its processing, prevents the use of certain functionalities or services, the use of which will involve the processing of data covered by the request. User have the right to request a restriction on the use of his personal data in the following cases:

a) when he or she questions the correctness of his or her personal data, in which case the Administrator shall restrict the use of his or her personal data for the time necessary to verify the correctness of the data, but no longer than for 7 days,

(b) when the processing of data is unlawful, and instead of deleting the data, the user requests a restriction on its use,

(c) when the personal data is no longer necessary for the purposes for which it was collected or used but is needed by the user to establish, assert or defend claims,

d) when he or she has objected to the use of his or her data, in which case the restriction shall be for the time necessary to consider whether, due to the particular situation, the protection of the user's interests, rights and freedoms outweighs the interests pursued by the Controller in processing the user's personal data.

c. b. The right of access to data (Article 15 of the GDPR Regulation): User have the right to obtain confirmation from the Data Controller as to whether it is processing personal data, and if it is, he has the right:

a) to gain access to your personal data;

b) to obtain information about the purposes of processing, the categories of personal data processed, the recipients or categories of recipients of such data, the intended period of storage of your data or the criteria for determining that period (when it is not possible to determine the intended period of processing), your rights under the GDPR Regulation and your right to lodge a complaint with a supervisory authority, the source of such data, automated decision-making, including profiling, and the safeguards applied in connection with the transfer of such data outside the European Union;

c) to obtain a copy of your personal data. d. the right to rectify data (Article 16 of the GDPR Regulation): The User has the right to request that the Personal Data Administrator immediately correct any inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the data subject has the right to request the completion of incomplete personal data, including by providing an additional statement, by addressing a request to the Personal Data Controller.

7. The Data Controller hereby also informs that it never transfers, sells, or lends the collected personal data of the Website users to third parties, except with the express consent or at the request of the user, or at the request of legally authorized state authorities in connection with ongoing proceedings (e.g., law enforcement agencies).

8. The Website uses "cookies", which are used for the purpose of identifying your browser when you use the Website so that we know what page to view. Cookies do not contain any personal information. When you access the Website, certain information may be placed on your computer, which may be in the form of a "cookie". Detailed and the most up-to-date information on this subject can be found directly on the manufacturer's website <http://www.google.pl/intl/pl/policies/technologies/types/>

9. "Cookies" are small files consisting of a string of letters and characters, stored on your computer when you visit a particular subpage of the Website. Cookies are used by the Website for the sole purpose of better customizing the site to your individual preferences. In addition, the "cookies" used on the Website may serve the following purposes:

(a) to ensure proper operation and improve the functionality of the Website;

(b) to improve the performance and optimization of the Website - "cookies" enable the Website to read information about how users navigate the Website and thus help improve its operation;

(c) targeting of informational and promotional content - "cookies" are designed to automatically tailor the content of the Website to your needs;

(d) to prevent spamming.

10. The information collected and generated by cookies on the Website does not allow personalization and identification of the user, and no personal data of the Website user is stored as a result of their use.

11. The "cookies" used on the Website are safe and have no harmful effect on your computer. By using the Website, you consent to the use of "cookies" in accordance with this Policy.

12. The User may at any time change the way cookies are used by the browser, including withdrawing consent to their use (by going to "Manage cookies"), blocking or deleting cookies from the Website. In most web browsers, you can delete, erase cookies from your computer's hard drive, block all cookies sent to you, or set a warning before storing such cookies on your drive. To do this, consult the manual or help topics of the web browser you are using. The process of controlling and deleting cookies may vary depending on the browser you use.

13.If the Website user does not consent to the use of minimal cookies, the Website will not be displayed correctly. Lack of user consent to the use of other cookies may limit some of the functionalities available on the Website. The user can allow only selected cookies by clicking "Let me choose".

14. The personal data controller uses statistical analysis of website traffic through Google Analytics (Google Inc., based in the USA), including the use of Google Analytics 4 tool - detailed information on this tool is available at the link: [https://support.google.com/analytics/answer/10089681?hl=pl&ref\\_topic=9143232](https://support.google.com/analytics/answer/10089681?hl=pl&ref_topic=9143232) . The data controller does not transmit personal data to the operator of this service, only anonymized information. The service is based on the use of cookies on the user's end device. Regarding the information about user preferences collected by the Google advertising network, the user can view and edit the information resulting from cookies using a tool: <https://www.google.com/ads/preferences/> Information on how Google uses data from the Website is available at the link <https://policies.google.com/technologies/partner-sites> and the link: <https://policies.google.com/technologies/cookies> .

15. The Personal Data Administrator shall process the personal data provided by the Website user in a manner consistent with the requirements of the law, including the provisions of the GDPR Regulation, and in particular shall secure the personal data of Website users against unauthorized access, loss or damage, also guaranteeing the confidentiality of any personal data provided to it.

16. The Website may also contain links to other websites not administered by the Personal Data Controller, the user may also be redirected to the Website from other sites, so the Personal Data Controller cannot be held responsible either for the content of those sites or for the degree of privacy protection implemented by the administrators of those sites. The Data Controller also informs you that this Policy applies only to the Website, and that when you go to other sites, it is recommended that you read the relevant site's privacy policy before providing your personal information there. When you decide to go to such sites and visit them, you do so at your own risk.

17. The Data Controller informs you that the Website contains a piece of HTML code that redirects users to the Website from the Meta (Facebook) social media site, which is loaded when a user visits the Website (the so-called tracking pixel), which allows the Data Controller to obtain information about traffic on the Website for the Data Controller's own marketing purposes, allowing, among other things:

- (a) measuring the effectiveness of advertisements by verifying, people who visited the Website or took certain actions on Meta (Facebook),
- (b) increase sales,
- (c) analysis of traffic on the Website to verify the effectiveness of Meta (Facebook) ads.

18. The personal data administrator is entitled to make changes to this Policy for important reasons (e.g. change in applicable legal provisions, change in the principles of operation of the Website). If changes are made at least 14 days prior to the effective date of the changes - appropriate information about the changes to the Policy will be posted on the Website.

19. The User of the Website is requested to immediately notify the Data Controller of any breach of security rules he/she finds related to the use of the Website.

20. In case of any questions, comments and requests or suggestions regarding this Policy, the Website User is invited to contact the Data Controller. All contact information for the Data Controller is indicated in the CONTACT section of the Website.

Wałbrzych, 17.09.2024