

## Privacy Policy

[document effective as of. 07.08.2024]

This document was created with you in mind - the confidentiality of your personal information and the protection of your privacy are of great importance to us. In this document you will find detailed information about the type and scope of our processing of your personal data.

### 1. What does the acronym GDPR stand for?

GDPR stands for EU General Data Protection Regulation and more specifically: 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).

We will use this abbreviation in the remainder of this information.

### 2. What is the purpose of applying GDPR?

The primary objective of the GDPR is to protect the fundamental rights and freedoms of individuals in connection with the processing of their personal data. We provide you with all of the following information also because this is our obligation under the GDPR regulations.

### 3. What is your personal information?

Personal data is any information about an identified or identifiable natural person ("data subject").

An identifiable natural person is one who can be identified directly or indirectly, in particular by an identifier such as a name, an identification number, location data, an Internet identifier or one or more specific factors that determine the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

So all of the above information is your personal information.

### 4. Who is the controller of your personal data?

The Data Controller of your personal data is us, i.e. Arago House spółka z ograniczoną odpowiedzialnością sp. k., based in Kominy, ul. Jastrzębia 24, Kominy, 87-300 Brodnica.

We are registered in the Register of Entrepreneurs of the National Court Register kept by the District Court in Toruń, VII Economic Department under the KRS number:

0001111135, NIP [Tax ID No.]: 8741812617, REGON [Business Reg. No.]: 528926591.

You can contact us at this mailing address by snail mail, but we are also available to you by email: [rodo@arago.house](mailto:rodo@arago.house) and by phone at

### 5. In what situations will we process your personal data?

We process your personal data in connection with:

- **Self-establishing contact with the Data Controller via e-mail or postal mail.**

If you initiate contact with us via email or postal mail, we obtain personal data directly from you in the form of such personal data that you yourself include in the messages you send to us.

In this case, your personal data is processed with your consent and for the purpose of realizing the Data Controller's legitimate interest in analyzing the inquiry you have sent or the matter you have reported, and in order to respond to you (the basis of Article 6(1)(a) and (f) of the GDPR).

We process your personal data until you withdraw your consent or object, but no longer than until we have successfully dealt with the matter with which you have approached us.

- **Self-establishing contact with the Data Controller via the hotline.**

In case you contact us through the hotline, take into account that all our calls are recorded. We will process the following types of your personal data: your voice, first name, last name, phone number, and possibly other data you give us during the call. We collect personal information directly from you in connection with the establishment of telephone contact.

In this case, your personal data is processed with your consent and for the purpose of realizing the Data Controller's legitimate interest in analyzing the inquiry you have sent or the matter you have reported, and in order to respond to you (the basis of Article 6(1)(a) and (f) of the GDPR).

We process your personal data until you withdraw your consent or object, but no longer than until we have successfully dealt with the matter with which you have approached us.

- **Viewing, using our website available at <https://arago.house> our use of cookies**

When we use cookies on our website (as detailed below), we process your personal data for preferential, statistical, marketing and other purposes, depending on which cookies you have given us permission to use (Article 6(1)(a) GDPR).

The data is stored until you withdraw your consent, which you can revoke at any time, which will not affect the legality of the processing performed on the basis of consent before its withdrawal.

- **Visits to our social media profiles**

The Data Controller maintains profiles on the following social media:

- Facebook - <https://www.facebook.com/people/Arago-House/61559726902378/>
- Instagram - [https://www.instagram.com/arago\\_house/](https://www.instagram.com/arago_house/)

Running a social media profile involves obtaining your personal data in connection with subscribing to our fan pages or social media channels (clicking the "Like", "Follow", "Subscribe", etc. icons), publishing a comment by you under any of the posts made on the fan page or channel, as well as sending a message via the social network.

In connection with the activities described above, we may process your personal data, in particular:

- user ID (may include first and last name);
- Your identification and other information to the extent published by you on your own profile on the relevant social network;

profile photo (through which, in some cases, we can learn your image); other photos (which may also depict an image) posted by you voluntarily under our posts; the content of the comments and the content of the conversation held with you via the social network in question; statistical data on visits to our social media profiles or channels.

Accordingly, we process your personal data for the following purposes:

- to maintain a profile or channel on social media, under the terms and conditions set by the operators of these social networks and to inform through it about the activities, services, events we organize, to share knowledge, as well as for the purpose of building and maintaining a community and for the purpose of communication through the available functionalities of social networks (comments, chat, messages, including sign-ups for events), which is our legitimate interest (the basis of Article 6(1)(f) GDPR);  
to conduct analyses of the functioning, popularity, use of social media profiles, which is our
- legitimate interest (the basis of Article 6(1)(f) of the GDPR).

**In addition, we would like to provide you with detailed information regarding the operation and consequences of posting personal information on Facebook**

If you use the statistics function on Facebook, we and Meta Platforms Ireland Limited act as joint controllers of the data processed for statistics purposes.

You'll find arrangements between the joint controllers that define the responsibilities for processing personal data

here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

Meta Platforms Ireland Limited has assumed primary responsibility under the GDPR for processing data for statistical purposes and for fulfilling all relevant obligations under the GDPR.

Tracking of activity on websites or apps can take place regardless of whether you are logged in or registered on a social network. We emphasize that we have no influence on the tracking of online activity applied by a given social network, which means that we cannot, for example, turn it off.

You can find detailed information about activity tracking in the privacy policies of social network operators.

As for the statistics we get from the operators, we have limited influence on them. If you are a logged in/registered user of a particular social network, verify your privacy settings to match your preferences.

- **Contacting us through our social media profiles**

When you initiate contact with us through our social media profiles, we obtain personal data directly from you in the form of such personal data that you yourself include in the messages you send to us.

In this case, your personal data is processed with your consent and for the purpose of realizing the Data Controller's legitimate interest in analyzing the inquiry you have sent or

the matter you have reported, and in order to respond to you (the basis of Article 6(1)(a) and (f) of the GDPR).

Information that is contained in private messages sent to us via social networks will be stored until your user profile on the social network is deleted or until our legitimate interest is realized or you object to the processing of your personal data, whichever comes first.

In the case of information held by us as part of your shared comments, it will be available on our profile or channel until you delete it.

Personal data collected by a given social network, i.e. history of posts, history of activity and messages sent, are subject to storage under the terms of the rules of a given social network.

Statistical data on visitors to our social media profiles will be processed for the duration of the availability of such data on the relevant social media site in accordance with its terms and conditions.

**Remember that in addition to us, the controller of your personal data is the operator of the particular social network you use and through which you visit our profile. In addition, read the rules and privacy policy of the social network you use and through which you visit our profile.**

- Sending us requests to exercise your rights in relation to the processing of personal data under the GDPR

You are entitled to certain rights in connection with the Data Controller's processing of your personal data (information about them can be found below in the Privacy Policy), so you can address correspondence to us regarding the exercise of these rights.

In this case, we obtain your personal data directly from you in the form of such personal data that you yourself include in the messages you send to us.

If the application is not sent directly by you, but by an attorney or legal representative, we additionally process data on this attorney or representative, i.e. their identification data, contact data and data on the type of authorization.

We process applicants' personal data for the following purposes:

- for the purpose of conducting contact and correspondence regarding a submitted request for the exercise of rights under the GDPR (the basis of Article 6(1)(c) of the GDPR), as the processing of personal data is necessary to fulfill the Data Controller's legal obligation under Article 12(1)-(3) of the GDPR;
- for the purpose of archiving correspondence conducted on the handling of a sent request for the exercise of rights under the GDPR, for evidential purposes and to demonstrate that we have timely responded to a sent request, which is our legitimate interest (basis of Article 6(1)(f) of the GDPR).

Please, take into account that providing personal data is necessary to carry out the requested request.

## 6. Cookies

Cookies are small text files that contain information about a user's activity on the Website and store it on the device from which the user accesses the Website.

Strictly necessary cookies do NOT legally require your prior consent. They are automatically installed on your device when you access our website or make certain

choices on our website. They are necessary for the proper functioning of the website, including the performance of certain tasks, such as, for example, the fulfillment of services ordered by you through the website. These cookies are not deleted when you stop browsing the site, but have a limited validity period.

Depending on your settings on our website, in addition to technically necessary cookies, we may use cookies for statistical, analytical or advertising purposes.

In accordance with applicable law, we may store cookies on your device if it is necessary for the operation of the service (these cookies are described above as necessary). For the use of any other types of cookies (especially analytics or advertising cookies), we need your permission.

If you give us **your** consent when you first visit our website or later through the cookie settings panel available at the bottom of our **"Change Your Consent"** page, we will also use other cookies that you have consented to.

You can change **your** cookie settings at any time using the cookie settings panel available at the bottom of the website by clicking on the **"Change your consent"** button.

## 7. Transfer of personal data outside the European Economic Area

Since the Data Controller uses Google Analytics, Google Tag Manager, Google Ads, as well as maintains social media profiles, personal data may be transferred by Google or the operator of the respective social network outside the European Economic Area, in particular to the USA.

In this case, Google or the operator of the social network is obliged to use appropriate safeguards, in particular EU standard contractual clauses. If this is the case, you may request a copy of these relevant protections from Google or the social network operator.

If you are interested, more information about the processing of your personal data by Google and the operators of social networks can be found in their privacy policies: Google <https://policies.google.com/privacy>

Facebook - <https://www.facebook.com/people/Arago-House/61559726902378/>

Instagram - [https://www.instagram.com/arago\\_house/](https://www.instagram.com/arago_house/)

## 8. Who are the recipients of your personal data and who will they be if we process your personal data?

According to the GDPR, the word "recipient" means a natural or legal person, public authority, entity or other entity to whom personal data is disclosed, regardless of whether it is a third party. We therefore indicate to you below to which entities we will disclose the personal information you provide to us.

The recipients of your data will be:

- a. Our authorized employees and associates to such an extent that we can properly handle your case;
- b. Entities that process personal data on our behalf for the fulfillment of the purposes for which the data is collected. In particular, these will be IT solution providers and IT service providers, technical, legal, financial support providers, as well as professional companies dealing with the operation of the central office. All of these entities must have access to the data in order to properly perform their duties. These entities will have access to your personal data only to the extent necessary to carry out the tasks incumbent upon them.



## 9. What rights do you have in relation to the processing of your personal data?

You have the following rights in connection with our processing of your personal data:

- the right to access your personal data, including obtaining a copy of its contents;
- the right to request rectification of your personal data;
- the right to request the deletion of your personal data;
- the right to request restrictions on the processing of your personal data;
- the right to withdraw consent (at any time) to the processing of your data personal information you voluntarily provided to us - however, withdrawal of consent does not affect whether the processing we carried out on the basis of your consent before you withdrew it was lawful. Consent can be withdrawn by sending a request to the email address: [rodo@arago.house](mailto:rodo@arago.house).
- where the basis for the processing of your personal data is our legitimate interest, you have the right to object at any time to the processing of your personal data on grounds relating to your particular situation.
- the right to portability of your personal data, which is the right to receive your personal data from us in a structured, commonly used computer format that is machine-readable. You can send this data to another data controller or request that we send your data to another controller. However, we will do this only if it is technically possible. You have this right only to the extent that we process your data based on your consent or agreement with you.

## 10. Where can you file a complaint if you feel your rights have been violated?

If you consider that our processing of your personal data violates the GDPR, you have the right to file a complaint with the supervisory authority, i.e. the President of the Office for Personal Data Protection. (For details on how to file a complaint, see

here: <https://uodo.gov.pl/pl/83/155>).

You can also always contact us first at e-mail: [rodo@arago.house](mailto:rodo@arago.house), so that we can explain our point of view to you and help clear up any doubts that arise.

## 11. Automated decision-making

We do not make decisions about you based solely on automated processing, including profiling.

## 12. Changes in privacy policy

This Privacy Policy may be updated in the event of a change in the law that affects the processing of your personal data, and in the event that we make changes to the processing of your personal data.