

## WEBSITE PRIVACY POLICY FOR [www.headware.pl](http://www.headware.pl)

### 1. General Provisions

**1.1** The data administrator is „HEADWARE” Adam Głowacki, ul. Legionów 13A/4, 87-100 Toruń, NIP 888 127 72 35, REGON 300016612. Data protection is carried out in accordance with the requirements of generally applicable law, and their storage takes place on secured servers .

**1.2** For the purposes of this document, it is assumed that:

**Data** means personal data, unless the context clearly indicates otherwise.

**The Company** means „HEADWARE” Adam Głowacki, ul. Legionów 13A/4, 87-100 Toruń, NIP 888 127 72 35, REGON 300016612.

**Person** means the person ‘Data subject’ unless otherwise explicitly stated in the context.

**GDPR** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of individuals 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 ) (OJ L 119, p. 1) .

**Website** means the website [www.headware.pl](http://www.headware.pl)

### 2. Nature of the data collected.

When collecting data, we follow the principles of legalism, reliability, transparency, minimization, adequacy and correctness of processed data formulated in the provisions of the GDPR. The data is processed for no longer than necessary and ensuring adequate security in accordance with the Personal Data Protection Policy adopted in the Company.

The company collects data on Persons from the following sources:

- forms placed at [www.headware.pl](http://www.headware.pl),
- means of communication such as e-mail messages, telephone contacts,
- contracts for the provision of services together with the data provided during their conclusion,
- logs of the servers hosting the Company Website .

### 3. Legal grounds and legitimate purposes of using data.

We use the information you provide:

- 3.1 to answer the question asked via the Website's contact form, based on your consent (Article 6 paragraph 1a of the GDPR);
- 3.2 to fulfill our obligations arising from tax and accounting regulations (Article 6 paragraph 1c of the GDPR);
- 3.3 to ensure the smooth operation of the Company's Website, which is our legitimate interest (Article 6 paragraph 1f of the GDPR);
- 3.4 for archival purposes to secure information in the event of a legal need to prove facts and for the eventual determination, investigation or defense against claims, which is our legitimate interest (Article 6 paragraph 1 f of the GDPR);

#### **4. Disclosure of data about you.**

If there is a justified need in connection with the Company's business, we may disclose your data to the following types of organizations and entities :

- companies providing legal, IT and accounting services to us - in order to ensure efficient day-to-day operations of the Company, fulfillment of obligations arising in particular from tax and accounting regulations, as well as in the event of possible determination, investigation or defense against claims;
- banks, to make payments;
- postal operators, couriers, carriers - to deliver correspondence and goods ordered through the Website.

#### **5. Cookies.**

The Website does not use cookies.

#### **6. Data transfer abroad.**

Your personal data is not transferred outside the European Economic Area.

#### **7. Profiling.**

The company does not conduct profiling within the meaning of the provisions of the GDPR.

#### **8. Storage of your data.**

- 8.1 We store your data obtained in connection with using the contact form on the Website for one year from the date they were obtained.
- 8.2 We store your data obtained for the conclusion of the contract for the duration of the contract negotiation and until the end of the calendar year following the year in which you last contacted us regarding its conclusion.
- 8.3 We store your data obtained in connection with the operation of the Website for one year from the date they were obtained.
- 8.4 We store your data obtained in connection with the concluded commercial transaction until the end of the period resulting from the obligation to store accounting documents under Art. 70 § 1 of the Tax Code - i.e. for 5 years from the end of the calendar year in which the tax payment deadline expired, whichever is the later.

#### **9. Voluntary submission of data.**

Providing personal data is voluntary, but if you do not provide it, we will not be able to answer your question via the contact form .

#### **10. Your rights.**

You have the right to:

- 10.1 know if we are processing your personal data and receive a free copy of your information;
- 10.2 to obtain a structured copy of the information provided to us in a machine-readable format;
- 10.3 to request the correction of your data which is incomplete, incorrect or outdated;
- 10.4 to delete data about you;
- 10.5 to limit the company's specific use of data;
- 10.6 to object to the specific use of data;

10.7 to lodge a complaint to the supervisory body (President of the Office for Personal Data Protection) regarding the processing of data by the Company.

When we receive your request, we may ask for additional information, including to verify your identity. In justified cases, we may refuse to comply with the requests indicated in point 10.1, 10.2 and 10.3 if they are unreasonable or excessive or they charge a fee for providing this information.

To exercise these rights, please contact the Company:

- by e-mail to the following address: [gdpr@headware.pl](mailto:gdpr@headware.pl),
- by post to the following address: „HEADWARE” Adam Głowacki, ul. Legionów 13A/4, 87-100 Toruń.