

PRIVACY POLICY

This Privacy Policy applies to all kinds of private information and personal data processed by RÖBEN POLSKA SP. Z O.O. I WSPÓLNICY SP. K. located in Środa Śląska, with the following address: ul. Ceramiczna 2, 55-300 Środa Śląska, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław – Fabryczna, 9th Economic Division of the National Court Register with KRS number: 0000332693, NIP: 8990027076 (hereinafter referred to as "RÖBEN POLSKA"), including those collected for specific purposes via the website: <https://roben.pl/>.

For matters related to the processing of your personal data by RÖBEN POLSKA, you may contact the company using the above address details or contact the designated Data Protection Officer at the following email address: administrator@roben.pl.

Our declaration

Information security and data protection are of utmost importance to us and we make every effort to ensure that our customers and users of our websites have genuine control over their data processing.

We make special efforts to ensure that all personal data is processed in accordance with the purpose for which it was collected and used in accordance with the scope of the authorizations (consents) granted and the areas of processing permitted by law. We comply with the principles arising from the applicable laws, in particular: the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) – hereinafter "GDPR", the Act of 10 May 2018 on the protection of personal data, the Act of 18 July 2002 on the provision of electronic services, as well as the Telecommunications Act of 16 July 2004.

In addition, we take special care to ensure that your personal information is:

- processed in a lawful manner;
- obtained only for specific purposes and not further processed in a manner incompatible with those purposes;
- correct and adequate, in relation to the purposes for which they are processed;
- adequately protected against unauthorized access, destruction, disclosure and unlawful use;

We ensure the security of personal data through appropriate technical and organizational measures to prevent unlawful data processing and accidental data loss, destruction and damage. The safeguards we use are reviewed and improved.

When does this Privacy Policy apply?

This Privacy Policy applies where our company is the controller of your personal data and processes it. This pertains both the case where RÖBEN POLSKA processes personal data it has obtained directly from the data subject and the case where it has obtained personal data from other sources. In both cases, RÖBEN POLSKA performs its information obligations set forth in Articles 13 and 14 of the GDPR, in accordance with these provisions.

This Policy does not apply, among other things, to situations where RÖBEN POLSKA processes your data solely as a processing entity (processor) – i.e., for example, when we perform a service for you at the request of another person/entity).

RÖBEN POLSKA acts as a personal data controller, i.e., as the entity that decides the purpose and manner of data processing, with respect to the personal data of individuals within the scope of performance of the contract concluded with them or individuals who have given their consent to the processing of their data for a specific purpose.

Purposes and legal basis of personal data processing

Personal data is processed by RÖBEN POLSKA on the basis of:

- article 6(1)(b) GDPR – when necessary for the performance of a contract, when the data subject is a party to it, or when it is necessary to take action prior to entering into a contract at the request of the data subject,
- article 6(1)(f) GDPR – if the processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. In particular, direct marketing of our products or services is considered a legitimate purpose.
- article 6 (1)(a) GDPR or Article 18 (4) of the Act of July 18, 2002 on the provision of services by electronic means – if you voluntarily consent to the processing of personal data. The granting of this consent is done in particular by checking a check box ("checkbox"), next to the statement of consent to the processing of personal data.

The data is processed until the completion of the contract; however, there is a possibility of further use of the data that is:

- necessary to assert claims arising from the performance of the contract;
- necessary for advertising, market research and customer/user behavior and preferences, with consent;
- authorized for processing under separate laws or agreement.

In situations stipulated by the provisions of the GDPR, customers and website users have the following rights:

- the right to access the content of their data;
- the right to correct their data;

- the right to request that personal data be completed, updated, rectified, and their processing to be temporarily or permanently suspended or deleted if they are incomplete, outdated, untrue or were collected in violation of the law or are no longer necessary for the purpose for which they were collected;
- the rights to object to data processing;
- the right to data portability;
- the right to withdraw consent to the processing of personal data for marketing purposes at any time.

Personal data of customers may be entrusted to other entities with whom we cooperate in order to properly provide services. Personal data is entrusted in accordance with Article 28 of the GDPR.

RÖBEN POLSKA does not render the collected data available to third parties, with the exception of situations

when it is required by generally applicable law, i.e., on the basis of a request from an authorized body or court. Your personal data is therefore processed by RÖBEN POLSKA, among other things, in connection with the handling of concluded contracts, for the time necessary for the performance of services and for the time during which it is possible to assert claims in connection with the services provided. If the basis for data processing is consent, this data will be used by RÖBENPOLSKA until the consent is revoked. For a period of one year counted from the date of withdrawal of consent to data processing. RÖBEN POLSKA may, however, store data to a limited extent for the purpose of demonstrating GDPR-compliant processing of such data, unless RÖBEN POLSKA as controller on other legal grounds is required to process your data for a longer period. At the same time, for the purpose of accountability, RÖBENPOLSKA will keep the data for the period in which it is obliged to preserve the data or documents containing them for the purpose of documenting the fulfillment of legal obligations, including enabling the control of their fulfillment by public authorities. Personal data processed by RÖBEN POLSKA may be disclosed to our subcontractors (entities cooperating under entrustment agreements to the extent necessary for the above purposes), business partners (entities supporting our services) and entities providing ongoing consulting services.

Cookies

The service allows the collection of information about the user through cookies and similar technologies, the use of which most often involves the installation of this tool on the user's device (computer, smartphone, etc.). This information is used to remember user decisions (font selection, contrast, policy acceptance), maintain user sessions (e.g., after logging in), remember passwords (with permission), collect information about the user's device and visit for security purposes, but also to analyze visits and customize content.

Information obtained through cookies and similar technologies is not combined with other data of Website users, nor is it used to identify them by RÖBEN POLSKA.

You have the option to set your browser to block certain types of cookies and other technologies, by specifying, for example, that only those necessary for the correct display of the site will be allowed. By default, most browsers allow all cookies but you have the option to change these settings at any time, and you can also delete already installed cookies. Each browser allows this through one of the options available in the settings or preferences.

- for Firefox:
<http://support.mozilla.org/pl/kb/ciasteczka>;
- for Google Chrome:
<http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>;
- for Windows Internet Explorer:
<http://windows.microsoft.com/pl-pl/windows-vista/cookies-frequently-asked-questions>;
- for Opera:
<http://www.opera.com/help/tutorials/security/privacy/>;
- for Safari:
<https://support.apple.com/pl-pl/HT201265>;

The user can also use the option of using the website in the so-called incognito mode, which blocks the collection of data regarding their visit.

Using the site without changing your browser settings, i.e., without the default acceptance of cookies and similar technologies, implies your consent to their use for the purposes specified above.

Type and use of cookie files

RÖBEN POLSKA uses the following types of cookies on the website:

- session files – temporary files, stored on the user's device until the user leaves the site or turns off the software (web browser),
- analytical – cookies installed by analytical systems that study the phenomena occurring on the site related to the flow and behavior of users in order to optimize the site. Cookie expiry time is set on a session basis or for a different period.

RÖBEN POLSKA uses the services of third parties that use cookies for the following purposes:

- monitoring traffic on our websites;
- collecting anonymous, aggregate statistics that allow us to understand how users use our website and enable us to continuously improve our products;
- using the tool to communicate;

These entities, as at the date of preparation of this document, include:

- Google LLC, which provides the Google Analytics tool (for more information and a browser extensions to block Google Analytics: <https://tools.google.com/dlpage/gaoptout?hl=pl>);

Policy Statement

This Privacy Policy became effective on 18.04.2023 RÖBEN POLSKA reserves the right to change the Policy if necessary as a result of changes in data processing, management, law or jurisdiction. The changes will be effective as of the date they are published on the website: administrator@roben.pl along with an indication of the date of their introduction.