

## PRIVACY POLICY AND COOKIES POLICY

Gonito Spółka z ograniczoną odpowiedzialnością with its seat in Gdynia respects your privacy and takes special care in protecting your personal data. For this reason, any correspondence sent to us, including electronically via email, is subject to our Personal Data Processing Security Policy and this Privacy Policy. These documents also apply to users of [www.goni.to](http://www.goni.to) and [www.gonito.pl](http://www.gonito.pl). We are committed to ensuring that everyone who visits our site, or directs correspondence to us, knows exactly how they can protect their privacy. We encourage you therefore to read our Privacy Policy.

Pursuant to Article 13(1)-(2) 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 (General Data Protection Regulation) (Official Journal of the EU L 119, p. 1) [hereinafter: GDPR], we inform you that:

**The Controller of your personal data is** Gonito spółka z ograniczoną odpowiedzialnością with its seat in Gdynia at ul. Wojewódzka 14/2 (81-437), registered in the Register of Entrepreneurs kept by the District Court Gdańsk-Północ, 7<sup>th</sup> Commercial Division of the National Court Register under the number 0000614757, NIP 586-230-58-23, REGON 364274652, share capital PLN 5,000.

We have not appointed a Data Protection Officer, as we are not required to do so under current law. If you have any doubts about the scope and purpose of the processing of your personal data, and your rights in connection therewith, please refer to this Privacy Policy or contact us by email at [\[biuro@gonito.pl\]](mailto:biuro@gonito.pl), telephone number +48 577 141 413, or in writing to our registered office address indicated above.

By using [www.goni.to](http://www.goni.to) and [www.gonito.pl](http://www.gonito.pl) or by directing correspondence to us, including electronic correspondence, you agree to the Privacy Policy.

### What personal data we process

We process data that you provide or leave as part of your use of the Services available on our website. This is primarily data necessary to enter into an agreement, and which you provide to us, for example, in forms or windows available on our Services, as well as data that you leave as part of navigating through our Services, that is, among other things, data stored in so-called cookies.

Data provided in forms or applications are processed for the purpose resulting from the function of the specific form, such as for the purpose of commercial contact. **Personal data collected include information such as:**

- a. Name and surname or name of the entity,
- b. Email address,
- c. Phone number,
- d. Residence, business or mailing address,
- e. Tax Identification Number (NIP) (applies only to Customers conducting business activity).

## Purposes, bases and periods of data processing

The legal bases and periods for processing your data for each purpose are as follows:

	Data processing purposes:	Legal bases:	Processing period:
1	<p><b>to draw up an offer</b> to conclude an Agreement for the sale of our products on the basis of information provided by you, as well as</p> <p><b>to conclude and perform the Agreement</b> for the sale of our products based on your interest in our offerings</p>	<p>Article 6(1)(b) GDPR – necessity for the performance of an agreement to which the User is a party</p>	<p>Until a relevant agreement between the Controller and the User expires, with the proviso that sometimes the data may also be processed after the expiration of that agreement, but only if permitted or required by applicable law, e.g., processing for statistical purposes, billing purposes, or for the purpose of defending or asserting claims; if no agreement is concluded within 3 years of our offer to you, your personal data will be deleted immediately, except for data needed for direct marketing.</p>
2	<p><b>analytical measurements</b> [of the selection of services to meet the needs of our customers, optimization of our products based also on your comments about them and your interest in them, optimization of service processes based on the course of sales and after-sales service processes, including complaints, etc.]</p>	<p>Article 6(1)(f) GDPR – legitimate interest of the Controller</p>	<p>until an effective objection is made or the Controller determines that the data has become obsolete</p>
3	<p>statistical measurement (hereinafter “<b>statistics</b>”), marketing (including data analysis and profiling for marketing purposes) of the controller’s products and services (hereinafter also “<b>proprietary marketing</b>”).</p>	<p>Article 6(1)(f) GDPR – legitimate interest of the Controller</p>	<p>until an effective objection is made or the Controller determines that the data has become obsolete</p>
4	<p>marketing (including data analysis and profiling for marketing purposes) regarding products</p>	<p>Article 6(1)(a) GDPR – voluntary consent</p>	<p>until consent is withdrawn</p>

	<b>Data processing purposes:</b>	<b>Legal bases:</b>	<b>Processing period:</b>
	and services of third parties (hereinafter also “ <b>third-party marketing</b> ”).		
5	<b>archiving – evidentiary purposes</b> in case of a legal need to prove certain facts or for the potential establishment, exercise or defence of claims	Article 6(1)(f) GDPR – legitimate interest of the Controller	until an effective objection is made or the Controller determines that the data has become obsolete

### **Right to object**

1. You have the right to object to the processing of your data at any time. We will stop processing your data unless we can demonstrate that there are compelling legitimate grounds for us to process your data that override your interests, rights and freedoms, or your data are necessary for us to potentially establish, exercise or defend claims.
2. At any time, you have the right to object to the processing of your data for direct marketing purposes. If you exercise this right – we will stop processing your data for this purpose.

### **Data recipients**

Your data may also be accessed by our subcontractors (processors), that is the accounting, legal and IT companies that serve us, as well as marketing agencies.

### **Rights of data subjects:**

In accordance with GDPR, each User has:

- a) the right to access their data and receive a copy of them;
- b) the right to rectify (amend) their data;
- c) the right to erase data or restrict data processing;
- d) the right to object to data processing;
- e) the right to lodge a complaint with the supervisory authority.

To exercise the above rights, contact the controller.

If your data are processed on the basis of consent, you may additionally exercise the following rights:

the right to withdraw consent to the extent that they are processed on that basis. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If your data are processed based on consent or as part of the service provided (the data are necessary for the purpose of providing the service), you may additionally exercise the following rights:

the right to portability of personal data, that is, to receive your personal data from the controller, in a structured, commonly used and machine-readable format. You may transmit this data to another data controller.

### **Information about the requirement/voluntariness of providing data**

The data are given freely, but they are necessary to provide the User – to provide you – with the Services, in particular, to prepare an offer or conclude an agreement, gain access to our software and use its functionalities.

### **Information about automated decision-making, including profiling**

The Controller will not make automated decisions based on Users' personal data, including decisions resulting from profiling.

We analyse the data we collect using solutions from third-party providers. We currently use Google Analytics. This tool works with cookies but does not provide personally identifiable data. Please read the details of the Google Analytics privacy policy.

The **Gonito** website can publish Google AdSense interest-based ads. They are customized by Google to reflect the Customer's interests. These interests are determined by Google's tracking of your behaviour across the web – using cookies. Viewing, deleting or adding interest categories related to the user's browser is possible through Google Ads Preference Manager, available at: <http://www.google.com/ads/preferences/>. Cancellation of participation in the AdSense affiliate network is possible at [http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html). However, the opt-out mechanism also uses cookies, which, as a consequence of removing them from the browser, will result in the loss of the opt-out decision.

### **Information about the intention to transfer data to a third country or international organization**

We do not intend to transfer Users' data to a third country or to international organizations.

Your personal data will not be transferred outside the European Economic Area (EEA).

We do not work with entities that do not warrant adequate protection of personal data, and in particular with entities within the EEA that do not comply with the requirements of the GDPR and our Privacy Policy.

We comply with the Personal Data Protection Act of 10 May 2018.

## COOKIES

### **We collect all data in two ways:**

Information provided freely by the User – in particular, when sending correspondence, including e-mails, during a telephone call, or provided when using contact forms on our website (commercial inquiries);

Information obtained during the use of the website – it is not associated with specific persons using the Website and is used only for server administration purposes. It may include:

Information in server logs – our servers automatically record such data as the page request sent by the user, the date and time of the request, device data (e.g., hardware model), browser type, browser language, operating system type, IP address and so-called cookies.

IP address – each computer connected to the Internet is assigned a unique number, or IP address. Based on it, it is possible, for example, to identify the country from which a given user connects to the network.

Cookies – computer data, in particular small text files, sent by the Website, which is visited by an Internet User to their terminal device (computer, smartphone, etc.), and which are stored on the terminal device and intended for the use of the Website. Cookies usually contain the name of the website from which they originate, the time they are stored on the terminal device and a unique number.

Considering the lifespan of cookies and other similar technologies, we use two main types of these files:

session – temporary files stored on the User's terminal device until the User logs out, leaves the website and application or shuts down the software (web browser);

permanent – stored in the User's terminal device for the time specified in the parameters of cookies or until they are deleted by the User.

We use cookies to:

make it easier for users to use the websites – cookies recognize the user's device and appropriately display the website, tailored to the user's individual needs,

maintain the session of the User of the Website – online store (when logged-in), thanks to which the User does not have to re-enter their login and password on each sub-page of the Website,

create anonymous statistics of the website – this allows us to better understand the expectations of our users and develop the website to make it even more friendly, identify the User’s profile in order to display tailored material to the User on advertising networks, in particular the Google network.

Most web browsers allow cookies to be stored on the User’s computer or smartphone by default.

In popular web browsers, the user, by making appropriate settings, can either allow cookies for all sites or block cookies for all sites or select sites whose cookies are allowed or blocked or specify the settings for certain cookies.

In addition, web browsers allow the user to delete cookies from the terminal device (computer, laptop, tablet, smartphone, etc.).

Thus, the User has the option to accept the handling of all cookies, to specify the settings of certain cookies, or to block or delete cookies.

In the Internet Explorer web browser, you can opt out of any cookies by clicking: “Tools” > “Internet Options” > “Privacy” and then selecting “Block all cookies” with the sliding selector.

In the Mozilla Firefox web browser, you can adjust your cookie settings by clicking: “Tools” > “Options” > “Privacy”.

In the Chrome web browser, you can adjust your cookie settings by clicking: “Settings” > “Advanced”, under “Privacy and Security” > “Content Settings” > “Cookies”.

Detailed information about the possibility and methods of handling cookies is available in the settings of each web browser.

Please note that blocking the use of cookies may adversely affect your proper use of our website.

We realize that we are responsible for protecting the data entrusted to us by Users. We take security issues extremely seriously. Therefore, we make efforts to protect your data from unauthorised access by third parties and control our methods of collecting, storing and processing information. We use firewalls, server security devices, encryption devices and physical security measures, among others. We grant access to data only to those employees and entities that need to have access to it in order to process it exclusively for the purposes described in the Privacy Policy.