# **Privacy policy**

# Privacy Policy and Cookies Infracht Sp. z o.o. in Kraków

#### **DATA ADMINISTRATION**

- 1. The Privacy Policy describes the way Infracht Sp. z o.o. in Kraków (hereinafter referred to as Infracht) uses the information and personal data collected by the website and specifies the rights of the website user towards data and information collected in such a way.
- 2. The administrator of the personal data is:

Infracht Sp. z o.o. in Kraków ul. Siewna 18, 31-231 Kraków entered into the register of entrepreneurs kept by
District Court for Kraków- Śródmieście in Kraków

11th Economic Division of the National Court Register

KRS 0000651823 Tax ID 6972329044 REGON 366066219

hereinafter referred to as Infracht Sp. z o.o.

3. This document refers to services rendered by the Administrator on the Infracht Platform in infracht.com, infracht.pl, and infracht.eu domains.

## YOUR PERSONAL DATA ARE SAFE WITH US

- 4. The data Administrator hereby agrees to protect the personal data according to the Personal Data Protection Act of 29 August 1997 and the Act on Rendering Electronic Services of 18 July 2002.
- 5. By specifying their personal data during account registration or at any point in using the Platform, the Infracht Platform User agrees for the data to be processed by Infracht for purposes of the execution of the contract and performing tasks described in the Terms of Use.
- 6. Infracht collects and processes data for the purposes of correct and effective functioning of services rendered by the Platform which can be used by the Users upon registration.
- 7. Infracht collects and processes personal data solely based on the User's consent for processing the data and solely for purposes of executing the order posted by the User, archiving or other electronic services, as well as for other purposes determined in the Terms of Use.
- 8. For the purposes of verifying the existence of the registering entity, Infracht collects and uses the following personal data: name, surname, name and address of the economic entity, Tax ID, REGON, phone numbers, fax, e-mail address, BOTM file number, User name, password. Also information which is not personal data and does not allow to identify the User is collected. Data such as: the number of the website

- Users, dwell time and similar statistical data are not regarded as personal data but are subject to Infracht cookie policy.
- 9. Personal data and information provided by the website User are processed by the data administrator based on the Polish Personal Data Protection Act of 29 August 1997, with due care regarding the protection of the collected information.
- 10. Especially, in order to ensure safety, Infracht:
  - Uses SSL encryption by accessing the account only by entering the correct login and password; it is recommended to set complicated, varied passwords consisting of more characters (small and capital letters, digits), and to keep the data solely for the User.
  - Verifies the methods of collecting, storing and processing data, including physical safety measures, in order to protect the system against unauthorized access.
  - Grants access to personal data only to employees, contractors, representatives and authorized persons who need the access due to the performed tasks and functions.
  - Informs the persons authorized to handle personal data to keep secret, under pain of severe consequences, including the termination of cooperation.
- 11. The collection of personal data has been reported to the register of personal data collections of the Inspector General for the Protection of Personal Data.
- 12. The data administrator reserves the right to make personal data available to third parties related to Infracht Sp. z o.o. to the extent necessary for the execution of the electronic services agreement and redress. The administrator sends the data with due diligence.
- 13. Following the Auction which ended with a transaction, Infracht shall process and make available only the data necessary for the Carrier and Customer to contact and verify the existence of a given economic entity using e.g. Tax ID number and BOTM file number; to settle the fee for using the website by the customers; for advertising purposes and for the research of the market and User behaviour and their preferences, with a view to improving the quality of services rendered by Infracht only upon obtaining the consent of the User; for explaining incorrect/forbidden use of the service; in circumstances permitted by law.
- 14. Unregistered Infracht Users may use the Website to a limited extent only, resulting solely in providing statistical data used by Google Analytics.

#### YOU DECIDE ON THE INFORMATION

- 15. The User can change or correct their data. They can also delete their account by sending a request to the system administrator to info@infracht.com (mailto:info@infracht.com)
- 16. At any time, the User has the right to withdraw their consent for the processing of their personal data, by sending an email to the Infracht team to info@infracht.com (mailto:info@infracht.com). Personal data are used only for purposes the User gave their consent to.
- 17. Infracht has the right to refuse the deletion of data if keeping the data is necessary for explaining the circumstances and the User's behaviour violating the provisions of Infracht Terms of Use or this Policy, or the law in force, and to determine the scope of User's responsibility.
- 18. Personal data processing can be aimed at communicating promotional and marketing information of products and services, upon the prior consent of the User expressed at the account registration. The User can withdraw their consent for receiving a newsletter by sending a request to the system administrator to info@infracht.com (mailto:info@infracht.com)
- 19. Upon the Users' request, Infracht gives them the possibility of accessing up-to-date information on the technical measures used which are supposed to prevent unauthorized attempts at obtaining or modifying the personal data sent by e-mail.
- 20. The Infracht Website grants its Users the right to control the processing of data applying to them and to obtain copies of data kept by Infracht.

#### **WE USE COOKIES**

- 21. Infracht uses the so-called cookies, small text files sent by Infracht through the browser and saved on a hard disk of a computer or other devices enabling the use of the website, thanks to which the Platform can remember the settings and collect information which makes it possible to adapt the services and contents to the Platform Users' preferences and needs, and also for statistical purposes using the Google Analytics tool.
- 22. Unfortunately, without using cookies we are not able to offer you the full system functionality.
- 23. Cookies can be used for determining the Users' identity (names, surnames, e-mail addresses, contact phone numbers etc.). A cookie file usually contains a so-called file validity period, the name of a domain it comes from and the parameter name and value.
- 24. Cookies are not harmful for the computer or other devices and data saved on them, that is why we recommend not disable them in the browser. Thanks to this, you will be able to save your preferences, e.g. the website language, or remember the posted and accepted offers.
- 25. Cookies are also used in developing statistics, they help to observe the way in which the Users utilize the Infracht Platform, which allows to improve its content and structure.
- 26. Cookies maintain the Infracht Platform User's session and thanks to this it is not necessary to log in to every subsite to be able to use all functionalities.
- 27. Infracht Platform uses the following types of cookies:
  - files necessary for the correct use of the basic Platform functions, e.g. cookies used with services requiring authorization,
  - · cookies used to guarantee the safety of the Platform Users,
  - performance files, informing of the way in which the Infracht Platform is utilized by the Users,
  - functional files, allowing to keep personalized Infracht User settings, i.e. language of communications, etc.
  - "advertising" cookies, the purpose of which is to provide the Users with commercial content adapted to their needs and hobbies.
- 28. Infracht retargets the advertisements of marketing partners in order to optimize the quality of advertisements displayed for the website users. Data transferred to such partners are entirely anonymized and serve solely the best matching of the ads.

## **CHANGES**

- 29. This document becomes effective on 19 June 2017.
- 30. In case any changes to the Privacy Policy are made, Infracht agrees to communicate this fact via the website in a timely manner before the new provisions become effective.