

Privacy and Security Policy

§ 1. General Provisions

1. The Administrator protects the User's privacy during the use of the Website and also complies with the legal regulations pertaining to personal data protection by using appropriate technical protection of the access to personal data.
2. The Privacy and Security Policy constitutes an appendix to the Rules and Regulations for the Provision of Services on the E-DEBT Internet Portal and, as a result, capitalised terms have the meaning specified in the Rules and Regulations.
3. The Privacy and Security Policy defines the terms listed below in the following way:
 - a. **"Cookies"**- means IT data, in particular, small text files which are saved and stored in devices, by means of which the User uses the Website pages.
 - b. **"Administrator Cookies"** - means Cookies placed by the Administrator, connected with the provision of services by electronic means by the Administrator through the Website.
 - c. **"External Cookies"** - means Cookies placed by the Administrator's partners through a Website page.
 - d. **"Other Technologies"**- means all other technologies used by the Administrator and its partners, which may result in storing and gaining access to data stored in the User's end device (including, amongst other things, technologies such as: Java Script files buffered in the User's end device, JavaScript, Local Storage, Session Storage, Flash Storage, HTML 5 Web Storage variables)
 - e. **"Device"**- means an electronic device, through which the User gains access to the Website.

§ 2. Personal details

1. The Administrator processes the User's personal details provided upon registration, i.e.:
 - a. Full name
 - b. Company name
 - c. E-mail
 - d. Phone number
 - e. VAT ID
 - f. NIN
 - g. Company address
 - h. Residence address
 - i. Mailing address
 - j. Bank account number
2. The data specified in Sec. 1 are provided by the User on a voluntary basis to allow the Administrator to provide the Service in a proper manner.
3. The User upon entering any data on the Website, including personal details of Counterparties, takes the obligation and ensures the Administrator that:
 - a. he/she has obtained and processes these data in accordance with law and, in particular, that he/she has the right to submit these data to the Administrator and the Administrator shall not be held liable towards any third party for illegal processing of personal data;
 - b. he/she does not infringe any personal interests or any other third party rights, the law, good customs and the principles of public order;
 - c. using the tools provided by the Administrator, he/she does so in good faith, using due diligence, without infringing any copyright or personal rights or other intellectual property rights (in particular, he/she does not publish on the Website other parties' trademarks or other names or legally protected marks);



- d. he/she acts in accordance with the principles of Internet etiquette.
4. If the Administrator receives a Reliable Message that the User infringes the Rules and Regulations and this Privacy and Security Policy, and, in particular, it acts in a way that is against Sec. 3 above, regardless of its rights resulting from legal regulations, it is entitled to instigate a discovery process, during which the performance of the agreement may be suspended. In the event of a breach of the Privacy and Security Policy by the User, the Administrator may terminate the agreement with the User.
5. The Administrator ensures to all Users the implementation of the rights resulting from the Personal Data Protection Act of 29 August 1997 (consolidated text, *Journal of Laws /Dz. U./* of 2002 No. 101, item 926 as subsequently amended) and in the Act of 18 July 2002 on Service Provision by Electronic Means (*Journal of Laws /Dz. U./* 2002, No. 144, item 1204, as subsequently amended), in particular, the right to access one's own personal data, the right to request that the data should be updated or removed or the right to raise objections in cases defined in the provisions of this act.
6. The collection of data performed by the Administrator was submitted for registration to the Inspector General for the Protection of Personal Data and was entered in the register of personal data collections. LKI Group, a limited liability company and a limited partnership with its registered office and address in Poznań, is the data administrator (as provided in the registration form) within the meaning of the Personal Data Protection Act.
7. The Administrator may, pursuant to Art. 31 of the Personal Data Protection Act, make personal data available to entities, which will provide technical services to its Users on its behalf (e.g. when sending text messages, voicemail messages or faxes requires such transfer of data).

§ 3. Technical support

Information contained in system logos may contain various data, e.g. the IP address, which results from the general principles of the Internet connection operations, the Administrator uses it for technical purposes connected with server administration and for collecting general statistical information.

§ 4. Commercial information

1. The Administrator reserves the right to send messages to Users, including, in particular, the ones concerning the Website operation, changes in its operation or messages concerning the Website. Each Website User has the right to opt out receiving such information from the Administrator.
2. Advertising content connected with the Administrator's and its business partners' commercial activities may be sent to Users only with their consent, pursuant to Art. 10 of the Act of 18 July 2002 on Service Provision by Electronic Means (*Journal of Laws /Dz. U./* 2002 No. 144 item 1204 as amended). The consent may be withdrawn by the User.

§ 5. Login and password

1. The Administrator uses technical and organizational means aimed at protecting the collected personal details against the unauthorised or improper use by unauthorised persons.
2. The User is responsible for keeping confidential his/her data in the form of the login and password.

§ 6. Account management

The form filled in by the User while signing up and logging into the Website and also the authorisation process (logging in) for the service are by default executed using the SSL protocol, which ensures the highest data transmission protection on the Internet.



§ 7. Data transmission protection

All passwords sent through the Website are sent through the encrypted SSL protocol.

§ 8. Contact with the Administrator

1. Website Users can contact Administrator employees directly by e-mail.
2. The Administrator stores the correspondence with its Users for statistical purposes and to receive possibly the best and the quickest response to any questions, which may arise and also as regards the resolution of complaints on the basis of the submission of possible decisions on administrative interventions in the User Account. Addresses and data collected in this way will not be used to communicate with the User for purposes, other than the reported issue. Possible communication on other matters may take place only with the User's prior consent.
3. The user contacts the Administrator to perform certain activities (e.g. file a complaint) through the User Service Department using the contact form which can be found at <https://e-debt.eu/panel/messages/communicator/>. The Administrator may request that the User should provide his/her data again, including personal data, such as his/her full name, e-mail address, etc., to confirm the User's identity and to be able to contact the User regarding the issue in question. The previous sentence applies only to the data, including personal data, which the User provided previously and to the processing, of which he/she has agreed. The provision of these data again is not obligatory; however, it may be necessary to perform the activities or to obtain information required by the User.
4. All questions and doubts concerning, in particular, the Rules and Regulations for the Provision of Services on the E-debt.pl Internet Portal, the Privacy and Security Policy should be directed to the User Service Department using the contact form available at <https://e-debt.eu/panel/messages/communicator/>.

§ 9. Types of Cookies used

1. Cookies used by the Administrator are safe for the User's Device. In particular, viruses or other unwanted software or malware cannot get to the Users' Devices in this way. These files allow for the identification of software used by the User and to adjust the Website individually to each User. Cookies usually contain the name of the originating domain, the time of their storage at the Device and a unique number.
2. The Administrator uses two types of cookies:
 - a. **Session cookies:** are stored in the User's device and remain there until the end of the browser session. The saved information is then permanently removed from the memory of the Device. The session cookies mechanism does not allow for collecting any personal data or any confidential information from the User's device.
 - b. **Permanent cookies:** are stored in the User's device and remain there until they are deleted. The end of the browser session or turning the Device off does not result in such cookies being removed from the User's Device. The permanent cookies mechanism does not allow for collecting any personal data or any confidential information from the User's device.
3. The User can limit or block the access to cookies in his/her Device. If this option is used, it will be possible to use the Website, apart from the functions which require the use of cookies.

§ 10
Purposes for which Cookies and Other Technologies are used

1. The Administrator uses Cookies, its Own and Other Technologies for the following purposes:
 - a. Website configuration,
 - b. Adjustment of the content of Website pages to the User's preferences and optimisation of the use of Website pages,
 - c. Saving the settings selected by the User and personalisation of the User interface,
 - d. Saving the history of pages visited on the Website to recommend relevant content,
 - e. The size of font, appearance of the website, etc.
 - f. Authentication of the User on the Website and ensuring a user session on the Website
 - g. Keeping the Website User session (after logging in), since the User does not have to enter his/her login and password on each subpage,
 - h. Correct configuration of the selected Website functions, allowing, in particular, for the verification of the authenticity of the browser session,
 - i. Optimisation and increasing the efficiency of services provided by the Administrator.
 - j. Implementation of processes necessary for full functionality of Website pages
 - k. Adjustment of the content of Website pages to the User's preferences and optimisation of the use of Website pages. In particular, these files allow for the identification of basic parameters of the User's Device and for displaying the web page appropriately in a manner adjusted to his/her individual needs.
 - l. Correct configuration of the selected functions of the Website allowing, in particular, for adjusting the information provided to the User, including its location.
 - m. Analyses and research as well as traffic audits
 - n. creation of anonymous statistics, which help to understand how Website Users use Website pages, which allows for improving their structure and content.
 - o. Ensuring security and reliability of the website.
2. The Administrator of the service uses Cookies, External and Other Technologies for the following purposes:
 - a. Presenting multimedia content on Website pages, which is downloaded from external websites (including, amongst other things, vimeo.com, youtube.com, wrzuta.pl)
 - b. Collecting general and anonymous statistical data through analytical tools (including, amongst other things, Google Analytics, Gemius Traffic)
 - c. Presenting advertisements adjusted to the User's preferences using an on-line advertising tool.

§ 11.
Possibility of defining conditions for storing or gaining access through Cookies

1. The User may independently and at any time change the setting concerning Cookies, defining the conditions for their storage and gaining access to the User's Device through Cookies. Changes in the settings, which are referred to in the previous sentence, can be made using the web browser or by means of service configuration. These settings may be changed, in particular, in a way that will block the automatic use of cookies in browser settings or will inform each time about the placement of Cookies in the User's device. Detailed information about the possibility and methods of the use of cookies are available in the software (web browser) settings.
2. The User can remove Cookies at any time using the functions available at the web browser he/she uses.
3. The limitation of the use of Cookies may influence some functions available on the Website.

§ 12.
Final provisions

The Privacy and Security Policy may be changed subject to the same conditions as the Rules and Regulations.