

# ORSAY PRESS ROOM PRIVACY AND COOKIES POLICY

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## 1) GENERAL PROVISIONS

1. This privacy policy of the Orsay Press Room is informative, which means that it is not a source of obligations for users of the Press Room. The privacy policy primarily contains rules regarding the processing of personal data by the Administrator in the Press Room, including the grounds, purposes and scope of processing personal data and the rights of data subjects, as well as information on the use of cookies and analytical tools.
2. The administrator of personal data collected through the Press Room is ORDIPOL SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Bielany Wrocławskie entered into the Register of Entrepreneurs of the National Court Register under the KRS number: 0000068811, the registration court in which the company documentation is kept: the District Court for Wrocław - Fabryczna in Wrocław, VI Commercial Division of the National Court Register, share capital in the amount of PLN 50,000.00; address of the place of business and correspondence address ul. Logistyczna 1, 55-040 Bielany Wrocławskie, NIP /Tax Identification Number/: 6772001669, REGON /National Business Registry Number/: 351359195, e-mail address: [press@orsay.com](mailto:press@orsay.com), telephone number: +48 71 7348 000 (fee in accordance with the operator's tariff) - hereinafter referred to as the "Administrator" represented in by Czech Republic by: ORDICZECH s.r.o. Klimentska 1246/1, Nove Mesto, CZ-110 00 Praha 1; in Slovakia by Ordislovak s.r.o., Križkova 9, 811 04 Bratislava; in Hungary by: MDO Kft. Bartók Béla út 15/B I/5H-1114 Budapest; in Romania by: SMS ROMANIA SRL, Frumoasa Offices, 30 Frumoasa street, 1st Floor, 1st District, Bucuresti.
3. Contact details of the Data Protection Officer appointed by the Administrator: **Piotr Lejza**, mailing address: Logistyczna 1, 55-040 Bielany Wrocławskie, Poland, with footnote „Data Protection Administrator”, e-mail address: [iod@orsay.com](mailto:iod@orsay.com).
4. Personal data on the Website are processed by the Administrator in accordance with applicable law, in particular in accordance with 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) - hereinafter referred to as "GDPR" or "GDPR Regulation". The official text of the GDPR Regulation: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>
5. Use of the Site is voluntary. Similarly, the provision of personal data by the user of the Website is voluntary, subject to two exceptions: (1) entering into contracts with the Administrator - failing in this instance and in the scope indicated on the Site and pursuant to the rules and regulations of the Site and this privacy policy, to provide personal data necessary to conclude and execute a contract with the Administrator shall result in the inability to conclude such a contract. Providing personal data in this event is a contractual requirement and if the data subject wants to conclude a given contract with the Administrator, he is obliged to provide the required data. Each time, the scope of data required to conclude the contract is previously indicated on the Website and in the regulations of the Website; (2) statutory duties of the Administrator - providing personal data is a statutory requirement resulting from generally applicable legal provisions imposing an obligation on the Administrator to process personal data (e.g. data processing for bookkeeping) and failure to provide them will prevent the Administrator from performing these duties.
6. The Administrator takes special care to protect the interests of persons whose the processing of personal data concerns, and in particular is responsible and ensures that the data collected by him is: (1) processed in accordance with the law; (2) collected for specified, legitimate purposes and not subject to further processing incompatible with those purposes; (3) factually correct and adequate in relation to the purposes for which they are processed; (4) kept in a form that permits identification of persons whom they concern, no longer than it is necessary to achieve the purpose of processing, and (5) processed in a manner that ensures adequate security of personal data, including

protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organizational measures.

7. Taking into account the nature, scope, context and purposes of processing as well as the risk of violating the rights or freedoms of natural persons with different probabilities and the seriousness of risk, the Administrator implements appropriate technical and organizational measures for processing in accordance with this Policy and to be able to prove it. These measures shall be reviewed and updated where necessary. The administrator uses technical measures to prevent the acquisition and modification by unauthorized persons of personal data sent electronically.
8. All words, expressions and acronyms appearing in this privacy policy and beginning with a capital letter (e.g. Website, Press Room) should be understood in accordance with their definition contained in the [Press Room Rules and Regulations](#) available on his websites.

## 2) GROUNDS FOR DATA PROCESSING

1. The administrator is authorized to process personal data in the event when - and to the extent that - at least one of the following conditions is met: (1) the data subject has given consent to the processing of his personal data for one or more specific purposes ; (2) processing is necessary for the performance of a contract to which the data subject is party or take action at the request of the data subject prior to the conclusion of the contract; (3) processing is necessary to fulfil the legal obligation of the Administrator; or (4) processing is necessary for purposes arising from legitimate interests pursued by the Administrator or by a third party, except when the interests or fundamental rights and freedoms of the data subject, requiring the protection of personal data, prevail over those interests , in particular when the data subject is a child.
2. The processing of personal data by the Administrator requires each time at least one of the grounds indicated in point 2.1 of this Privacy Policy. The specific grounds for processing the personal data of the Service Users of the Website by the Administrator are indicated in the next section of this Privacy Policy - in relation to the given purpose of data processing by the Administrator.

## 3) PURPOSE, GROUNDS, PERIOD AND SCOPE OF PROCESSING DATA ON THE WEBSITE

1. Each time, the purpose, grounds, period and scope of, and recipients of personal data processed by the Administrator results from actions taken by a given user on the Website.
2. The Administrator may process personal data on the Website for the following purposes, on the following grounds, during periods and in the following scope:

The purpose of data processing	Legal basis for processing and data retention period	Scope of processed data
<b>Implementation of a contract (e.g. newsletter) or taking action at the request of the data subject, before concluding the above-mentioned contract</b>	<p>Article 6 paragraph 1 letter b) of GDPR Regulations (performance of the contract)</p> <p>The data is stored for the period necessary to implement, terminate or otherwise terminate the concluded contract.</p>	Maximum scope: email address, region.
<b>Direct marketing</b>	<p>Article 6 paragraph 1 letter f) of GDPR Regulation (legally justified interest of the administrator)</p> <p>The data is stored for the duration of the legitimate interest pursued by the Administrator, but no longer than during the period of limitation of claims against the data subject, due to the business activity conducted by the Administrator. The limitation period is defined by the law, in particular the Civil Code (the basic period of limitation for claims related to running a business is three years, and for a contract of sale two years).</p> <p>The administrator cannot process data for direct marketing purposes in the</p>	Maximum scope: email address, region.

	event of effective dissent of the data subject in this regard.	
<b>Marketing of Administrator's services and products</b>	Article 6 paragraph 1 letter a) of GDPR Regulation (consent)  The data is stored until the data subject withdraws his consent for further processing of his data for this purpose.	Maximum scope: email address, region.
<b>Establishment, investigation or defence of claims that may be raised by the Administrator or which may be raised against the Administrator</b>	Article 6 paragraph 1 letter f) of GDPR Regulations  The data is stored for the duration of the legitimate interest pursued by the Administrator, but no longer than during the period of limitation of claims against the data subject, due to the business activity conducted by the Administrator. The limitation period is defined by the law, in particular the Civil Code (the basic period of limitation for claims related to running a business is three years, and for a contract of sale two years).	Maximum scope: name and surname, e-mail address.

#### 4) DATA RECIPIENTS ON THE WEBSITE

1. It is necessary for the Administrator to use the services of external entities (such as, for example, a software supplier, an IT company) for the proper functioning of the Website, including for the implementation of contracts. The Administrator uses only the services of such data processors that provide sufficient guarantees of implementing the appropriate technical and organizational measures, so that the data processing meets the requirements of GDPR Regulation and protects the rights of data subjects. Personal data is not transferred to a third country or any international organization.
2. The transfer of data by the Administrator shall not take place in each case and not to all recipients or categories of recipients indicated in this Privacy Policy - the Administrator provides data only when it is necessary for the purpose of processing personal data and only to the extent necessary to achieve it.
3. Data of users of the Website may be transferred to the following recipients or categories of recipients:
  - a. service providers supplying the Administrator with technical, IT and organizational solutions enabling the Administrator to conduct business activities, including the Website and services provided through it (in particular, IT companies, e-mail and hosting providers and suppliers of software necessary run the Website) for managing the company, marketing activities, sending the newsletter and providing technical support to the Administrator) - The administrator provides the collected personal data of the user to a selected supplier acting on his behalf only in the event and to the extent necessary to achieve a given purpose of data processing in accordance with this Privacy Policy.

#### 5) THE RIGHTS OF THE DATA SUBJECT

1. **Right of access, rectification, restriction, deletion or transfer** - the data subject has the right to request the Administrator to access his personal data, rectify them, remove ("the right to be forgotten") or limit the processing and has the right to object to the processing and to transfer his data. Detailed terms and conditions for the exercise of the abovementioned rights are indicated in art. 15-21 of GDPR Regulation.
2. **The right to revoke consent at any time** - a person whose data is processed by the Administrator on the basis of expressed consent (pursuant to Article 6 paragraph 1 letter a) or art. 9 par. 2 letter a) of the GDPR Regulation) has the right to withdraw consent at any time without affecting the legality of the data processing, which was carried out on the basis of the consent before its withdrawal.
3. **The right to lodge a complaint to the supervisory body** - a person whose data is processed by the Administrator, has the right to lodge a complaint to the supervisory body in a manner and mode specified in the provisions of GDPR Regulation and the Polish law, in particular the Act on the Protection of Personal Data. The President of the Office for Personal Data Protection is the supervisory body in Poland.
4. **The right to object** - the data subject has the right to object at any time - for reasons related to his particular situation - to the processing of his personal data based on art. 6 par. 1 letter e) (public interest or tasks) or f) (legitimate interest of the administrator), including profiling based on these provisions. In such an event, the Administrator may no longer process such personal data unless he demonstrates the existence of vital legally valid grounds for processing that override the interests, rights and freedoms of the data subject or the grounds for determining, investigating or defending claims.

5. **The right to object to direct marketing** - if personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of his personal data for such marketing purposes, including profiling, to the extent to which the processing is related to such direct marketing.
6. In order to exercise the rights referred to in this point of this Privacy Policy, you can contact the Administrator by sending a relevant message in writing or by e-mail to the Administrator or Data Protection Administrator's inspector specified at the beginning of this Privacy Policy or using the contact form available on the Website.

## 6) COOKIES ON THE WEBSITE, OPERATIONAL DATA AND ANALYSIS

1. Cookies are small text information in the form of text files, sent by the server and saved on the side of the person visiting the Website (e.g. on the hard drive of the computer, laptop or on the smart phone's memory card - depending on which device is used to visit our Website). Detailed information about cookies as well as the history of their creation can be found, among others here: [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie).
2. The Administrator may process data contained in Cookies when users use the Website for the following purposes:
  - a. implementation of basic functionalities of the Website, such as maintaining sessions, storing dynamic data, e.g. statistics, summaries;
  - b. adjusting the content of the Website to individual preferences of the Service Recipient (e.g. regarding language);
  - c. keeping anonymous statistics showing how to use the Website;
3. Normally, most web browsers available on the market accept cookies by default. Everyone has the possibility to define the terms of using cookies using his own browser's settings. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the option of saving cookies - in the latter case, however, it may affect some of the functionalities of the Website.
4. The browser settings with regard to cookies are important from the point of view of consent to the use of cookies by our Website - in accordance with the law, such consent can also be expressed through the settings of the web browser. In the absence of such consent, the browser's settings as regards cookies should be changed accordingly.
5. Detailed information on changing Cookies settings and their self-removal in the most popular web browsers are available in the help section of the web browser and on the following pages (just click on the link):
  - [for Chrome browser](#)
  - [for Firefox browser](#)
  - [for Internet Explorer browser](#)
  - [for Opera browser](#)
  - [for Safari browser](#)
  - [for Microsoft Edge browser](#)
6. The Administrator may use on the Website the services of Google Analytics, Universal Analytics provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA.). These services help the Administrator analyze traffic on the Website. The data collected are processed as part of the above mentioned services in an anonymised way (these are the so-called operating data that prevent the person from being identified) to generate statistics helpful in administering the Website. These data are aggregate and anonymous in nature, i.e. they do not contain identification features (personal data) of persons visiting the Website. The Administrator using the above services on the Website collects such data as the source and medium of obtaining visitors to the Website and the manner of their preservation on the Website, information on devices and browsers from which they visit the website, IP and domain, geographic data and demographic data (age, sex) and interests.
7. It is possible to easily block information being provided Google Analytics about the activity on the Website by a given person - you can install a browser plug-in provided by Google Inc. for this purpose, which is available here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## 7) FINAL PROVISIONS

1. The Website may contain links to other websites. The administrator urges to read the privacy policy of these websites after switching to them. This Privacy Policy applies only to the Administrator's Website.