

PRIVACY POLICY

The Controller of your personal data is JJ MANAGEMENT Spółka z ograniczoną odpowiedzialnością spółka komandytowa having its registered seat in Warsaw at ul. Rzeczycka 26, 04-940 Warsaw, entered into the Register of Entrepreneurs kept by the District Court for the City of Warsaw in Warsaw, 13th Economic Division of the National Court Register under KRS (National Court Register) number 0000481295, NIP (tax identification number): 952-212-66-67 and REGON (statistical identification number): 146925555 (hereinafter referred to as the "**Controller**").

The use and processing of personal data is in accordance with the Act of 10 May 2018 on the protection of personal data (Dz.U. of 2019, item 1781) and 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 the "GDPR").

The Controller processes personal data:

- a) With regard to persons who have subscribed to the newsletter - in order to provide the newsletter service. The legal basis for the processing of personal data in this case is Article 6(1)(f) of the GDPR, i.e. the legitimate interests pursued by the Controller in the form of direct marketing of products and services;
- b) With regard to natural persons who are customers of the Controller - in order to conclude, enforce, perform a contract, to take measures necessary to conclude a contract and to communicate between the parties in connection with the performance of the contract. In this case, the legal basis for the processing of personal data is Article 6(1)(b) of the GDPR;
- c) With regard to representatives, employees, associates or vendors of the Controller's contractors - in order to conclude, enforce, perform a contract, to take measures necessary to conclude a contract and to communicate between the parties in connection with the performance of the contract. In this case, the legal basis for the processing of personal data is Article 6(1)(b) of the GDPR;
- d) With regard to persons who have registered via the application form to participate in the training organised by the Controller - in order to conclude a contract for the organisation of the training and to fulfil the obligations towards the participant of the training, in particular the preparation and proper performance of the training service. In this case, the legal basis for the processing of personal data is Article 6(1)(b) of the GDPR;
- e) With regard to persons who have submitted a request via the contact form - in order for the Controller to contact such persons and to respond to the request. In this case, the legal basis for the processing of personal data is Article 6(1)(a) of the GDPR.

The Controller processes personal data falling into the category of regular personal data. The personal data provided to the Controller will not be used for automated decision-making, including profiling.

The Controller has appointed a Data Protection Officer (hereinafter referred to as the "DPO"), i.e. Adam Czajka, who can be contacted by e-mail at: adam@adbl.eu. The DPO may be contacted in all matters relating to the processing of personal data.

The Data Subject has the right to access the provided data and right to obtain a copy of the data, as well as the right to request their rectification, erasure, restriction of their processing, the right to object to their processing, to request their transfer, and to withdraw consent to their processing at any time (provided that the processing is consent-based) without affecting the legality of processing that was performed on the basis of consent before its withdrawal, as well as the right to lodge a complaint with the President of the Personal Data Protection Office by submitting it to the address of the Personal Data Protection Office: ul. Stawki 2, 00-193 Warsaw.

The recipients of the personal data provided may be the Controller's employees and associates, business partners, entities providing consulting, HR and payroll, bookkeeping, tax, legal, accounting, IT, ICT, hosting, and auditing services to the Controller.

Provision of personal data is voluntary, but necessary to receive the newsletter (in relation to newsletter subscribers), to participate in the training organised by the Controller (in the case of persons who have registered for the training organised by the Controller), to receive a reply to a request sent via the contact form (in the case of persons who have used the contact form), to conclude, enforce, perform a contract, to take measures necessary to conclude a contract and to communicate between the parties in connection with the performance of the contract (in relation to the Controller's customers, as well as representatives, employees, associates or vendors of the Controller's contractors). Failure to provide personal data prevents the Controller's sending of the newsletter, participation in the training organised by the Controller, receipt of a reply to a request sent via the contact form and the Controller's contact with the customer or with the representative, employee, associate or vendor of the Controller's contractor.

The Controller will ensure appropriate measures to protect the personal data of the data subjects, corresponding to market standards, in order to protect and ensure their confidentiality, accuracy and availability, as well as to protect them against unauthorised use or unauthorised access, in accordance with the guidelines and policies adopted by the Controller and the with the legislation in force.

Where the processing involves the transfer of data outside the European Economic Area, it will be carried out with the use of the standard contractual clauses approved by the European Commission, in order to ensure an adequate level of data protection required by law.

The personal data will be stored for the period necessary to fulfil the purposes for which they were collected, i.e.:

- in the case of data processed for the purposes of sending the newsletter - until the person concerned submits a declaration on unsubscribing from the newsletter;
- in the case of data processed in order to participate in the training organised by the Controller - until the prescription of civil law claims related to the concluded contract;
- in the case of data of natural persons who are the Controller's customers and representatives, employees, associates or vendors of the Controller's contractors - until the prescription of civil law claims related to the concluded contract;

- in the case of persons who have submitted a request via the contact form - until they withdraw their consent.

Insofar as it is necessary, the personal data will be stored by the Controller until the prescription of civil law claims, and in cases where the data would be processed for the purposes related to the fulfilment of legal obligations incumbent on the Controller, the personal data will be processed and stored by the respective Controller for these purposes for as long as it may be required by law.

In matters related to the processing of personal data by the Controller and in order to exercise the rights referred to in the Privacy Policy, one should contact the Controller by sending an e-mail to the following address: adam@adbl.eu or by sending a letter by post to the following address: ul. Pajęcza 23, 04-802 Warsaw.