

Privacy Policy

Below is information on the basic rules for the processing of personal data through the website <https://ecco-group.eu> (hereinafter referred to as "the Website").

Personal Data Controller: Ecco Group Sp. z o.o., based at ul. Stanisława Jachowicza 26, 60-195 Poznań, Poland, registered under KRS number 0000703849, NIP number 7811958077, and REGON number 368745806.

Contacting the Controller: by mail at the registered office address: ul. Stanisława Jachowicza 26, 60-195 Poznań, Poland.

For the purposes of this Privacy Policy, "User" refers to any individual visiting the Website or using one or more services or functionalities of the Website.

The Controller collects personal data that is necessary to provide specific services offered or data voluntarily provided by the User when using the contact section.

Through the Website, including the contact section, we process the following personal data:

- **User contact information** (contact section, email, social media): first name, last name, email address, and possibly other data voluntarily provided in the message content, e.g., phone number, nickname, data shared by the User on social media.

The Controller, by operating the website, gathers statistics (using analytical tools), which constitutes a legitimate interest. Consequently, the Controller may collect data such as software and hardware parameters used by the User, pages viewed, mobile device identifier, demographic data, age, gender, interests, and other data concerning devices and usage of systems. Collecting this information generally does not allow for unequivocal identification of the User.

Using the Website, like nearly every website on the Internet, involves "leaving" an IP address on the server. In conducting statistics, we do not use Users' IP addresses.

We have placed links to our social media accounts on the Website. When clicking the link, the User is redirected to Facebook or LinkedIn. The administrators of these social networks have their privacy policies, which are worth reviewing. The Controller will have access to public data provided by the User who communicates through these social networks.

When contacting us through these networks, there is a possibility that the content may be viewed by others.

The owners of social media networks to which we redirect from our Website declare processing of personal data compliant with GDPR.

Cookies and Automated Data Processing

The Controller uses cookie technology.

Cookies are data files, particularly text files, that are stored on the User's end device and intended for use with websites. Cookies typically contain the name of the originating website, the storage duration on the end device, and a unique number.

The Website uses two main types of cookies: "session" (session cookies) and "persistent" (persistent cookies). Session cookies are temporary files stored on the User's end device until logging out, leaving the website, or shutting down the software (web browser). Persistent cookies are stored on the User's end device for the time specified in the cookie parameters or until deleted by the User.

Users can change cookie settings at any time, including upon their first visit to the Website, to block the automatic handling of cookies in their web browser settings or notify each time cookies are placed on the User's device. Detailed information on cookie management options is available in the browser settings. Cookies are used for purposes such as creating statistics to understand how Users use websites, improving their structure and content; determining the User's profile for displaying tailored content in ad networks, especially Google.

Most Users and some mobile browsers automatically accept cookies. If the User does not change the settings, cookies will be stored in the device memory. Users can change cookie acceptance preferences or switch browsers to receive a notification each time the cookie function is set. To change cookie acceptance settings, adjust them in the browser.

Blocking or deleting cookies may limit full use of the website.

We recommend reading the privacy policies of these companies to understand the cookie usage policies in statistics: <https://policies.google.com/privacy>.

Cookies may be used by ad networks, particularly Google, to display ads tailored to how the User uses the Website. For this purpose, they may store information about the User's navigation path or time spent on a particular page.

Purposes and Basis of Personal Data Processing

We process personal data based on Article 6(1)(b) of the GDPR to the extent necessary for the performance of tasks related to contract execution and for taking actions prior to concluding a contract in the category of general data.

General data will also be processed to the extent necessary for determining, asserting, and defending claims, conducting Website statistics, responding to inquiries, and direct marketing, based on Article 6(1)(f) of the GDPR (legitimate interest of the Controller).

Email addresses, first and last names (or other data provided in the message) submitted via contact, including through social media accounts, are processed based on Article 6(1)(a) and (f) of the GDPR, which is the consent given and legitimate interest of the Controller to respond to the question.

Personal Data Retention Period

Personal data will be processed for as long as necessary for:

- Responding to inquiries and conducting correspondence, followed by archiving correspondence due to the Controller's legitimate interest, e.g., to defend against claims, improve customer service levels - up to the expiration of potential claims, no longer than 3 years from the end of correspondence.
- Safeguarding or asserting potential claims until claims expire.
- Statistics – 2–14 months.

Personal data processed for direct marketing purposes will be processed until the person concerned withdraws their consent or objects.

Personal data processed based on separate consent will be retained until it is withdrawn unless otherwise required by law.

Rights of Data Subjects

Users have the right to:

1. Access their personal data, i.e., confirm if the Controller processes data and obtain information on such processing.
2. Rectify data if the data processed by the Controller is incorrect or incomplete.
3. Request deletion of data unless the Controller has a legal basis for continued processing.
4. Request restriction of data processing.
5. Transfer data, i.e., the right to receive personal data provided to the Controller and transmit it to another controller.
6. Object to data processing based on the Controller's legitimate interest or direct marketing purposes.
7. File a complaint with the Polish supervisory authority or another EU member state's supervisory authority competent for the User's place of residence or work, or for the place of alleged GDPR infringement. In Poland, the supervisory authority is the President of the Personal Data Protection Office.
8. Withdraw consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal).
9. Obtain Controller intervention, express their own position, and contest decisions based on automated data processing.

Rights toward the Controller can be exercised via email or postal contact at the addresses indicated at the beginning of the Privacy Policy.

Data Recipients

Recipients of data may include entities cooperating with the Controller, entities authorized to receive data under applicable laws, including appropriate judicial authorities. The data recipient includes the website hosting provider, legal advisors, IT service providers, and social media owners to which the User is redirected through links provided by us.

With User consent, data may also be shared with other entities for their own purposes, including marketing.

The Controller reserves the right to disclose selected User information to appropriate authorities or third parties requesting such information based on a proper legal basis and in compliance with applicable law.

If the User contacts the Controller via social media, they should first familiarize themselves with and accept the privacy policies of each platform provider. The Controller has no influence on data processing by these entities.

International Data Transfers

The Controller does not transfer personal data outside the European Economic Area. However, recipients mentioned above may do so, as specified in their privacy policies. Google Analytics, Meta Inc. (Facebook), and LinkedIn Corporation (owned by Microsoft) are global companies, meaning data flow is international. All listed entities declare compliance with standard contractual clauses.

Data transfers only occur when necessary, permitted by one of the conditions in Article 49 of the GDPR, and with an appropriate level of protection, primarily through:

- a) Cooperation with entities processing personal data in countries for which an adequate decision has been issued by the European Commission.
- b) Using standard contractual clauses issued by the European Commission.
- c) Applying binding corporate rules approved by the relevant supervisory authority.

The Controller will inform about the intention to transfer personal data outside the EEA.

No automated decisions with legal effects for the User are made on the Website based on profiling.

If you have any questions after reading this information, please contact us.

The Controller reserves the right to change the Privacy Policy content at any time. New content will be posted in the tab, and the previously applicable content will be available as a downloadable document, indicating the date until it was in force.