

# Privacy and cookie policy

## I. General Information

1. Transparent Data spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office at ul. Mickiewicza 27/5, 60-835 Poznań (hereinafter: "Transparent Data/TD", "Administrator") respects the privacy of every person using Transparent Data services, including visitors to the Transparent Data website, and ensures data security at all times when using its services. websites.
2. This Privacy and Cookies Policy (hereinafter referred to as the "Policy") sets out the principles of collecting, processing and using personal data, as well as information about cookies and other similar functions used on Transparent Data websites.
3. Transparent Data is the administrator of personal data of people using Transparent Data websites and services.
4. As part of our activities, we have appointed a Data Protection Inspector who is responsible, among others, for: for monitoring compliance with personal data protection regulations. In all matters relating to the protection of personal data, you can contact the data protection officer: Anna Reszela, e-mail address: [gdpr@transparentdata.pl](mailto:gdpr@transparentdata.pl) or at the following address: Data Protection Inspector Transparent Data spółka z limited liability partnership limited partnership, ul. Mickiewicza 27/5, 60-835 Poznań.

## II. Purposes and legal basis for the processing of personal data

1. A person using the Transparent Data website (hereinafter referred to as the "User"), who merely browses the website and reads publicly available content, does not have to inform us about his or her identity. However, when using the Website, cookies and other similar functions are used. The information contained in cookies may indirectly identify a specific website user. Detailed rules regarding the use of cookies are described in the section regarding cookies (Section VIII "COOKIE Policy").
2. Transparent Data processes Users' personal data in accordance with the provisions of 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/WE (hereinafter: "GDPR"), based on:

- art. 6 section 1 letter a GDPR – based on the consents granted;
- art. 6 section 1 letter b GDPR - in order to perform the contract, including the provision of services to Users using the website;
- art. 6 section 1 letter f GDPR, i.e. for purposes related to the implementation of the legally justified interests of Transparent Data, which are promoting Transparent Data services, enabling communication, integrating content, examining traffic on Transparent Data websites, creating measurements and statistics, as well as for the purpose of possible pursuit of claims or defense against claims.

### **III. Personal data processing period**

The processing period of your personal data depends on the purpose for which the processing is carried out. Transparent Data processes personal data as long as the conditions indicated above exist. In relation to the services we provide, your data will be processed for the period in which these services will be provided and, sometimes, after the end of their provision, but only if it is permitted or required under applicable law, e.g. processing for statistical purposes or in for the purpose of pursuing claims. In such a case, the data will be processed only for the period necessary to achieve such purposes. To the extent that your data is processed based on the legally justified interests of Transparent Data, it will be stored until an objection to their processing is raised or for the period of limitation of claims that the data subject may have against the Administrator.

### **IV. Voluntary provision of data**

Providing any personal data is voluntary, but may be necessary to provide the services provided by Transparent Data.

### **V. Rights of data subjects**

The data subject has:

- the right to access your data, including obtaining a copy of your data
- the right to request rectification of data
- the right to delete data (in certain situations)
- the right to limit data processing

- the right to object to processing regarding data processing based on our legitimate interest and making it available to other entities
- the right to lodge a complaint with the supervisory authority responsible for the protection of personal data, i.e. the President of the Personal Data Protection Office, ul. Stawki 2, 00193 Warsaw

To the extent that your data is processed as part of the service provided (data is necessary to provide the service), you can additionally exercise the right to transfer personal data, i.e. to receive your personal data from the Administrator in a structured, commonly used format suitable for machine readability. To exercise the above rights, please contact us or our Data Protection Officer. Contact details are indicated above.

## VI. Recipients of personal data

Data may be transferred to entities from the Kaczmarski Group ([kaczmarskigroup.pl/grupa](http://kaczmarskigroup.pl/grupa)), entities providing organizational and IT services, including ICT, entities providing Transparent Data with other services ensuring proper functioning websites, courts, law enforcement agencies, banks, entities providing advisory services and legal assistance, and other entities indicated in the provisions of generally applicable law.

## VII. Security of Personal Data

Transparent Data has a personal data security system that meets the requirements of the GDPR.

## VIII. COOKIE policy

Transparent Data websites use cookies. This is small information that is saved on the User's end device (e.g. laptop, phone) while browsing Transparent Data websites. Transparent Data websites may also use other tools with functions similar to cookies (e.g. pixels, beacons, tags).

### Types of cookies used by Transparent Data

Transparent Data websites and third-party providers use

- **essential cookies** which enable, among others, correct display and proper functioning of Transparent Data websites and ensure the safe use of Transparent Data websites,
- **optional cookies** (Marketing, Measurement, Other), which enable, among others, personalizing advertisements, providing content tailored to the User's preferences on Transparent Data websites and on other websites, content integration, traffic research on Transparent Data websites, creating measurements and statistics, developing and improving Transparent Data services and creating new products and services based on interactions User. The User may consent to optional cookies.

**List of cookies used is available [tutaj](#)**

## Cookie storage time

Cookies used on Transparent Data websites are divided into:

- persistent cookies - stored on the end device until the User deletes them on their own or the time specified in the parameters of a given cookie expires;
- session (temporary) cookies - stored on the end device until the software is turned off or the browser session ends (until it is closed).

## Entities using cookies on Transparent Data websites

Depending on who uses cookies, we can distinguish:

- own cookies - these are cookies placed and to which only Transparent Data has access;
- cookies from external suppliers (such as Google Ireland Ltd, Consentmanager AB, Hotjar LTD, Albacross Nordic AB, Mixpanel, Meta Platforms Ireland Limited).

**Detailed information about the cookies used by Transparent Data and third-party providers is also available by clicking the "Data protection settings" widget.**

## How to disable cookies

Users can manage cookie preferences directly in the settings of their end device.

Within the scope of consents given, Users have the option of withdrawing them using the "Data protection settings" widget.

Additionally, via a web browser, Users can specifically allow all cookies, disable the installation of cookies, delete cookies, or block cookies.

Disabling, deleting or blocking cookies may negatively affect the quality of use of Transparent Data websites.

If you want to change the cookie settings in your browser, you can follow the instructions below:

- Google Chrome [https://support.google.com/chrome/answer/95647?hl=pl&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=pl&p=cpn_cookies)
- Mozilla Firefox <https://support.mozilla.org/pl/kb/wzmocniona-ochrona-przed-sledzeniem-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US>
- Apple Safari <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>
- Microsoft Internet Explorer <https://support.microsoft.com/pl-pl/window/s/usuwanie-plik%C3%B3w-cookie-i-zarz%C4%85dzanie-nimi-168dab11-0753-043d-7c16-e-de5947fc64d>

- Microsoft Edge  
<https://support.microsoft.com/pl-pl/microsoft-edge/usuwanie-plik%C3%B3w-cookie-w-przegl%C4%85darce-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
- Brave  
<https://support.brave.com/hc/en-us/articles/360022806212-How-do-I-use-Shields-while-browsing>
- Opera <https://help.opera.com/pl/latest/web-preferences/>

## IX. Final information

Transparent Data reserves the right to make changes to the Policy by posting the new Policy on Transparent Data's websites in advance.