DobryKurs Privacy Policy

This Privacy Policy constitutes an integral part of the Platform Terms of Service of 08.01.2018 (Terms of Service). Definitions of the terms used in this Privacy Policy were included in the Terms of Service. The provisions of the Terms of Service shall be applied accordingly.

1. PERSONAL DATA

1.1. Personal data provided by the User shall be processed by DobryKurs (i.e. WALUCIARZ.PL S.A., with its registered office in Warsaw at 12 Noakowskiego Street apt. 61, 00-666 Warsaw, entered in the register of entrepreneurs maintained by the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register (KRS) under number KRS: 0000386709, Tax Identification Number NIP: 7811864293, National Business Registry Number REGON: 301744029, share capital: PLN 1,960,785.00, paid-up in full), which is the Personal Data Controller within the meaning of the Data Protection Act of 29.08.1997. You may contact us in particular via e-mail at: biuro@dobrykurs.pl.

1.2. The scope of processed personal data shall be determined by the scope of data completed by the User and subsequently sent to us by means of a relevant form. The processing of personal data may pertain to User's Personal Identification Number PESEL, workplace, series and number of documents, date and place of birth, residential address, e-mail address, first and last name, phone number and computer IP address.

1.3. Personal data shall be processed for the following purposes: (a) implementation of legal provisions, (b) provision of services by electronic means, examination of filed complaints and other actions as specified in the Terms of Service, (c) activities connected with direct marketing of DobryKurs (d) promotional and commercial actions of DobryKurs.

1.4. The provision of personal data shall be voluntary, but the lack of consent to process the personal data marked as obligatory shall prevent DobryKurs from performing services and agreements.

1.5. The legal basis for processing personal data in the case referred to in paragraph 1.3(a) is the statutory authorization to process data which are essential to act in accordance with the law, whereas in the cases referred to in paragraphs 3(b) and 3(c) it is the statutory authorization to process data which is necessary to perform an agreement if the data subject is a party to such agreement, or if it is essential for undertaking certain actions prior to conclusion of the agreement upon request of the data subject, and a voluntary consent of the User (also in the case referred to in paragraph 3(d).

1.6. User's personal data shall only be transferred for the purpose of performing agreements for provision of services by electronic means by DobryKurs to a hosting company providing services to DobryKurs and a company providing direct marketing services to DobryKurs. Personal data collected by DobryKurs may also be disclosed to: competent state bodies upon their request on the basis of relevant provisions of law, or other persons and entities—in the cases prescribed in the provisions of law.

1.7. User's personal data may only be disclosed to unauthorized entities under this Privacy Policy upon User's prior consent.

1.8. The User shall have the right to control the processing of data which refer to him/her, and which are collected in databases; in particular, he/she shall have the right to: (a) access his/her data, complete and correct them through filing a relevant request with DobryKurs; (b) demand temporary or permanent suspension of their processing, or their deletion if they are incomplete, invalid, inaccurate, or if they have been collected in violation of the law, or they have become unnecessary for realization of the purpose for which they had been collected; (c) raise an objection against processing his/her personal data—in other cases as prescribed by the legal provisions—and the right to demand their deletion if they have become unnecessary for realization of the purpose for which they had been collected.

1.9. If DobryKurs is advised that the User uses the service provided by electronic means in violation of the Terms of Service or applicable provisions of law (unauthorized use), then DobryKurs may process the personal data of the User in the scope required for establishing the liability of the User. DobryKurs may also disclose User's data for the purposes related to the law, protection, and security.

2. OTHER DATA

2.1. The Platform may store http enquiries, therefore the files containing web server logs may store certain data, including the IP address of the computer sending the enquiry, the name of User's station—identification through http protocol, if possible—date and system time of registration on the Platform and receipt of the enquiry, number of bytes sent by the server, the URL address of a site visited by the User before if the User has entered the Platform through a link, information

concerning User's browser, information concerning errors which occurred during execution of the http transaction. Web server logs may be collected for the purpose of proper administration of the Platform. Only persons authorized to administer the IT system shall have access to the data. The files containing web server logs may be analyzed for the purposes of preparing statistics concerning traffic on the Platform and occurring errors. Summary of such details shall not identify Users.

3. INFORMATION SECURITY

3.1. User's personal data shall be stored and secured in accordance with the rules prescribed by the applicable legal provisions. DobryKurs shall apply technological and organizational means in order to secure the processing of personal data adequate to the threats and category of data to be secured, in particular, through technical and organizational means DobryKurs shall secure data against being disclosed to unauthorized persons, taken over by an unauthorized person, processed in violation of the law, and changed, lost, damaged or destroyed. The set of Users' personal data shall be stored on a secured server, moreover, the data shall also be secured by DobryKurs' internal procedures related to the processing of personal data and information security policy. DobryKurs uses the secure socket layer (SSL) technology, which is designed to encrypt the transmission of information exchanged between User's browser and DobryKurs' website.

3.2. In order to log in to the Account, it is necessary to provide the relevant username and password. In order to ensure an adequate level of security, the password to the Account exists only in an encrypted form.

3.3. At the same time, DobryKurs states that using the Internet and services provided by electronic means poses a threat of malware breaking into User's teleinformatic system and device, as well as of an unauthorized access to User's data, including personal data, by third parties. In order to minimize such threats, the User should use appropriate technical security means, e.g. using up-to-date antivirus programs or programs securing identification of the User in the Internet. In order to obtain detailed and professional information related to security in the Internet, DobryKurs recommends taking advice from entities specializing in such IT services.

4. COOKIES

4.1. For the purposes of correct operation of the website, DobryKurs uses Cookies support technology. Cookies are packages of information stored on the User's device through the website, usually containing information corresponding to the intended use of a particular file, by means of which the User uses the website—these are usually: the address of the Internet service, the date of publishing, the lifetime of a Cookie, a unique number, and additional information corresponding to the intended use of the particular file.

4.2. DobryKurs shall use two types of Cookies: session cookies, which are permanently deleted upon closing the session of the User's browser, and permanent cookies, which remain on the User's device after closing the session until they are deleted.

4.3. It is not possible to identify the User on the basis of Cookie files, whether session or permanent. The Cookie mechanism prevents collecting any personal data.

4.4. The Cookies used on the website are safe for User's device, in particular they prevent viruses or other software from breaking into to the device.

4.5. The User may disable storing Cookies on his/her device in accordance with the instructions of the browser producer, but this may disable entire services or parts of them.

4.6. DobryKurs shall use own Cookies for the following purposes: authenticating the User and preserving User's session; adjusting the content of sites to User's preferences, such as: recognizing User's device, remembering settings set up by the User; Cookies ensuring security of data; analyses and researches of views; advertisement services.

4.7. DobryKurs shall use third-party Cookies for the following purposes: preparing statistics (anonymous) for the purposes of optimizing functionality of the website by means of analytic tools such as Google Analytics; Optimizers;

4.8. The User may individually change the Cookies settings at any time, stating the conditions of their storage, through the Internet browser settings or configuration of the service. The User may also individually delete Cookies stored on his/her device at any time in accordance with the instructions of the browser producer.

4.9. Detailed information concerning Cookies support is available in the browser settings.