

# Privacy and Cookies Policy

## Regulating the principles of personal data processing by Centuran Consulting (part of Sidnet Solutions Sp. z o.o.).

### 1. GENERAL PROVISIONS

#### 1.1. Controller

We are the controller of your personal data.

Our registration details are: Sidnet Solutions sp. z o.o. with its registered office in Warsaw, address: ul. Górczewska 156/32, 01-460 Warsaw, entered in the register of entrepreneurs kept by the District Court for the City of Warsaw under KRS no. 0000569248, REGON 362159467, NIP 522303477, share capital: PLN 100,000.00.

#### 1.2. Contact details of the Controller

E-mail: [rodo@sidnet.pl](mailto:rodo@sidnet.pl)

Address: Sidnet Solutions sp. z o.o., ul. Górczewska 156/32, 01-460 Warsaw

When making requests and demands for personal data, we will need the information necessary to identify what the request is about. If we do not receive such data, we will not be able to process the request. We will respond to requests within one month.

#### 1.3. Definitions

**The policy** is this PDF file

**Personal data** is all information that has already led to the identification or identifiability of a natural person

**GDPR** is 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

#### 1.4. Legal grounds for processing personal data

We collect and process personal data in accordance with the relevant legislation, in particular the GDPR, the Act of 10 May 2018 on the protection of personal data (Journal of Laws of 2018, Item 1781 as amended), Articles 18 and 19 of the Act of 18 July 2002 on the provision of electronic services (Journal of Laws of 2020, Item 344 as amended).

#### 1.5. Information on the collection and processing of personal data

We inform you of the collection of your personal data when we collect it. At that time you are also informed why and on what legal basis we process your personal data.

We provide you with access to information on how your personal data is processed.

In certain situations, especially if we have already informed you once (and there has been no change), we will not inform you again you about the collection or processing of your personal data. We will always inform you about an incident that puts your data protection rights and obligations at risk (e.g. we will inform you about a so-called

personal data leak).

## **1.6 Basic principles for the processing of personal data**

We ensure that the processing of personal data takes place transparently and only to the extent necessary for the purpose for which it was collected (e.g. our contact forms require you to provide your name, e-mail address, or telephone number for contact).

We do not keep personal data for longer than necessary (e.g. once you have arranged an online consultation, we delete personal data that you provided to arrange that consultation).

We guarantee the security and confidentiality of the personal data processed. Your personal data is only processed by the persons we have authorized to do so due to their competence and the tasks entrusted to them. We take care to allow access to personal data only to those coworkers or employees who need such access in order to carry out specific activities (e.g. carrying out consultations). We also ensure that after a change of position or termination of employment, our authorized employees or coworkers do not have access to personal data. We endeavor to ensure that subcontractors, coworkers, and employees who process personal data apply appropriate security measures when processing your personal data. You will find a list of our subcontractors processing your personal data during the policy period in clause 3 below.

We analyze the risks and monitor that the personal data security measures taken remain appropriate to the current risks. If necessary, we will implement additional security measures.

## **2. PURPOSES, LEGAL BASIS, AND DURATION OF PROCESSING**

### **2.1. Introduction**

Depending on the communication channel and the purpose for which you contact us, this is the personal data we will collect and how we will process this data. A detailed description of the categories of personal data processed, the purpose and manner of processing, the legal basis, and the retention period for such data are indicated in: (a) paragraph 2.2 (for traditional correspondence or e-mail), (b) clause 2.3 (for telephone contact), (c) clause 2.4 (for contact form) and (d) clause 2.5 (for consultation).

The period of processing will depend on the purpose for which we process the data. If the data is processed on the basis of consent (this applies to data voluntarily provided under Article 6(1)(a) of the GDPR), then the data may be processed until the consent is withdrawn. If the personal data are processed for the purpose of fulfilling a contract with you, the data are stored until the contract is terminated. In this case, the processing of personal data may be extended by the time necessary to protect our rights (especially against claims) until the statute of limitations for these claims has expired. As a general rule, this will be no longer than 6 years for consumers and 3 years for businesses from the time of termination of the contract. After the end of the processing period, the data are deleted or anonymized.

The following is a list of purposes, the legal basis, and specific processing periods for personal data.

### **2.2. If you send us a letter or e-mail**

When you send us a letter or e-mail for a purpose other than the performance of

a contract you have entered into, we will collect your personal data, such as your e-mail and address, name (or nickname), and telephone number (if you provide these details in your correspondence), for the sole purpose of handling your correspondence. We will take note of the matter you are contacting us about and what we can or should do for you in relation to it (e.g. if you write about a problem, ask for an offer or employment opportunity, we will write back to you in accordance with your request).

In this case, we process your personal data on the basis of our legitimate interest, as we need to handle the correspondence that comes to us in order to conduct our business (Article 6(1)(f) GDPR) or to take action in accordance with your request (Article 6(1)(b) GDPR). Once the action has been completed, we will delete your personal data. We will leave your personal data in an e-mail, a letter (a scan of a letter) if this is needed to exercise our rights (e.g. we will leave e-mails confirming certain facts in case of legal proceedings and defence against unjustified claims) until the expiry of these claims, not longer than 3 years.

### **2.3 If you call**

If you call and we are not yet connected to the contract, we will make a note of who contacted us and those personal details (name or nickname, telephone number, e-mail address) you give us in order to contact you and take action you ask us to take. We will use your personal data to review the case and to call you back or contact you through another preferred contact channel.

We process your personal data in order to take action in response to your request, application, or complaint (Article 6(1)(b) GDPR). The legal basis for processing your personal data will also be the pursuit of our legitimate business interest (Article 6(1)(f) GDPR).

If the matter you are calling about does not require action on our part, we will remove your personal data as soon as possible after the call. If we need your personal data to take action, we will delete your data only after we have taken action and settled the matter. We will leave your personal data if it is clear from the telephone conversation that we need it to exercise our rights (e.g. we will leave e-mails confirming certain facts in case of legal proceedings and defence against unfounded claims) until the claims have expired, not longer than 3 years.

### **2.4 If you submit a contact form**

In order to submit a contact form, you must provide an e-mail. This is necessary in order to get in touch with us and to respond to your inquiry. The provision of additional personal data (e.g. name, nickname, or telephone number) is possible and voluntary (this is done with your consent). It is not necessary in order to contact us via the form. We will process your personal data in order to identify who is contacting us and to follow up on the matter with which you are contacting us.

The legal basis for the processing of your e-mail is that the provision of this personal data is necessary for the handling of the service contract (consisting of enabling you to be contacted via the form) (Article 6(1)(b) GDPR). If you provide additional personal data, the legal basis for processing this data is your consent (pursuant to Article 6(1)(a) GDPR).

If we need your personal data to take action, we will delete your data once we have taken action and dealt with the matter. We will leave your personal data if we need it to exercise our rights (e.g. we will leave a form submission to confirm certain facts in the

event of legal proceedings and to defend against unfounded claims) until the claims have expired, not longer than 3 years.

## **2.5 If you order a consultation**

To request a consultation, you will need to provide your name and e-mail. This is necessary to make an appointment. The provision of additional data (telephone number or name) is possible and voluntary (it is done with your consent). It is not necessary to arrange a consultation.

The legal basis for the processing of your e-mail and name is that the provision of this personal data is necessary for the handling of the service contract (consisting of the appointment and consultation) (Article 6(1)(b) of the GDPR). If you provide additional personal data, the legal basis for their processing is your consent (pursuant to Article 6(1)(a) of the GDPR).

We will delete your personal data after consultation. We will only leave the data if it arises from the consultation that we should take an agreed action (e.g. prepare an offer) or if we need to do so in order to exercise our rights. In this case, we will leave the personal data until the expiry of the claim, not longer than 3 years.

## **3. SOCIAL NETWORKS**

We have public profiles on social networks: LinkedIn and GitHub. We, therefore, process your personal data if you are a user of these portals. This may be done in order to enable activity on the profiles, to manage these profiles accordingly in connection with the promotion and marketing of our services, and for statistical purposes. When required by the situation, the processing of data (e.g. comments posted on the portals) occurs for the defence of our rights, good name, or against claims (not longer than 3 years).

The legal basis for the processing is our legitimate interest (Article 6(1)(f) of the GDPR) to promote and market our activities and to defend ourselves against claims.

## **4. CONTRACTS WITH COUNTERPARTIES**

We provide detailed information on the processing of personal data in each case at the latest at the time of conclusion of the contract or at the time the personal data is obtained to the extent necessary to take action in the relationship with the contractor. Most often in such cases, we process the personal data of the contractor's staff for the purpose of ongoing contact with the contractor. For this purpose, we record and process name, surname, position, telephone, and e-mail (business contact data). The basis for the processing of personal data is our legitimate interest in the proper performance of the contract (Article 6(1)(f) GDPR).

We process personal data for as long as necessary for the performance of the contract and, after the contract has expired, for the defense of our rights (e.g. against claims). We do not keep personal data for longer than 3 years.

## **5. YOUR RIGHTS**

You are entitled to:

- a) information about the processing of personal data (e.g. whether personal data are processed, for what purpose, and on what basis),
- b) access to your personal data (e.g. obtaining a copy of the data),

- c) rectification of personal data (e.g. deletion of erroneously recorded data),
- d) delete personal data if it is not necessary for our legitimate interest or to defend against claims,
- e) restrictions on the processing of personal data,
- f) withdrawal of consent,
- g) to object to the processing of personal data to the extent of personal data provided voluntarily on the basis of such consent,
- h) lodge a complaint to the supervisory authority in the field of personal data protection, which is the President of the Office for Personal Data Protection (orally into the minutes during office hours from 8:00 to 16:00, in writing to the office address: Office for the Protection of Personal Data [*Urząd Ochrony Danych Osobowych*], ul. Stawki 2, 00-193 Warsaw, electronically to the Electronic Pod Box of the President of the Office for the Protection of Personal Data [*Prezes Urzędu Ochrony Danych Osobowych*]: /UODO/Skrytka2).

## 6. LIST OF SUBCONTRACTORS TO WHOM WE SHARE PERSONAL DATA

**6.1.** We may pass your personal data to subcontractors who support us in our business, such as courier, and advisers (legal, tax, or accountants).

**6.2.** Please be advised that the active chat room provided on [www.centuran.com](http://www.centuran.com) is operated by HubSpot, based in Cambridge, Massachusetts (United States of America). HubSpot's privacy policy is available here: [legal.hubspot.com/privacy-policy](https://legal.hubspot.com/privacy-policy)

**6.3.** We may share anonymized data (i.e. data that does not identify you) with Google Inc. based in Mountain View, California, United States of America.

The purpose of the sharing is:

- a) to better identify the attractiveness of Google Ads and Google Ads services for sponsored links appearing among Google search results,
- b) to monitor using Google Analytics how users use our websites to improve the functioning of the website by ensuring more effective navigation.

Google's privacy policy is available: [policies.google.com/privacy](https://policies.google.com/privacy). You can disable the measurement of activity by Google using the link: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout)

**6.4.** The online calendar for ordering consultations (clause 2.5) is operated by an external entity, Pipedrive OÜ, based in Estonia, which has its own Privacy Policy in relation to its role as a communication operator, available at: [pipedrive.com/en/privacy](https://pipedrive.com/en/privacy).

**6.5.** We do not share your personal data outside the European Economic Area. Due to the location of the software providers indicated in clauses 6.2 and 6.3 above, anonymized data (i.e. data that should not allow the identification of the data subject) may be transferred to the United States of America. A standard of contractual provisions is provided by the currently applicable set of standard contractual clauses approved by the European Commission for the processing of personal data. Google includes these standard clauses in its contracts with customers such as us. If for any reason your personal data were to be shared outside the European Economic Area, we will inform you of this at the stage of collection.

## 7. COOKIE POLICY

**7.1. What is a cookie?** A cookie is a small piece of text that our website sends to your browser (on your mobile device or computer) and that your browser sends back the next time you visit the website. They are used to store certain settings and data for the purpose of using websites. This ensures that you do not have to enter the same information every time you return to [www.centuran.com](http://www.centuran.com) and want to fill in a contact form or make an appointment for a consultation. Read more here: [pl.wikipedia.org/wiki/HTTP\\_cookie](http://pl.wikipedia.org/wiki/HTTP_cookie)

### 7.2 Why do we register an IP address?

The registration of your IP address in our databases aims to:

- a) diagnosing problems related to the operation of our server,
- b) security breach analysis,
- c) management of our websites,
- d) collecting data on the region from which your call originated.

**7.3** The cookie used is not harmful to you or the device you are using. We recommend that you leave cookies in your browsers. In many cases, the web browsing software (web browser) allows information to be stored in the form of cookies on your device by default. You can change your browser's use of cookies at any time. To do so, you will need to change your browser settings. How to change the settings varies depending on the software (web browser) you use, and their manufacturers offer detailed guides on how to do this on their websites.

**7.4** For details on how to manage cookies on your mobile phone or another mobile device, please refer to the user manual for your mobile device. However, if you disable cookies, you may not be able to access the latest version of the website or may experience unstable operation, including the data entered on the website.

## 8. FINAL PROVISIONS

**8.1.** The policy is effective from 25 June 2024.

**8.2.** We will publish a new version of the policy at [www.centuran.com/privacy-policy](http://www.centuran.com/privacy-policy). We will inform you by e-mail of the policy change if your personal data will continue to be processed by us.