

Privacy Policy

Sparados SA

Here at Sparados we value protecting customer privacy. Below we publish an explanation of what data we collect and what rules we apply for its processing and use. We limit the use and collection of information about website users to the necessary minimum, required to provide you with the highest quality of service.

This document contains information on: Personal data controller, rights, and cookies in the browser,

To preserve clarity, the following terms have been used throughout this document:

We, - Sparados SA with registered office in Lublin, ul. Rusalka, 17a, Lublin, 20-103 entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Lublin, 6th Commercial Department of the National Court Register, under the KRS number 0000985680, NIP [tax ID] 9462719635, REGON 522752701, with share capital of PLN 305 500,

You - a natural person, who entrusts their personal data to be processed for at least one of the purposes indicated in this information. In order to increase the clarity of the text, we have allowed ourselves to address you directly.

1. Privacy Statement Information

In this Privacy Statement, we explain – in an accessible and transparent way – what personal data we collect about you, and how we process it. The present Statement relates to:

- all our former, current and potential customers. According to the law in place, we are obliged to keep personal data about you, also for a certain time after the end of our mutual relations,
- any person involved in any transaction through the Sparados Service.

Personal data refers to all information that may tell us something about You or that we may associate with You. This includes Your full name, address, date of birth, payment card details, address of residence, IP address or information regarding payments that you make with our agency. We understand processing as everything we can do with such data, such as collecting, recording, storing, changing, organizing, using, disclosing, transferring or deleting it.

You share your personal information with us when you become a customer, sign up for our online services, fill out an online form, use our products and services or contact us through one of our communication channels.

2. The types of data we collect about you

The personal data we collect include:

- Identifying information such as your full name, date of birth, identification number, e-mail address and IP address of your computer or mobile device, phone number,
- Transaction details, such as Your payment card number, amount and where the transaction is being processed,
- Data about online behaviours and preferences, such as IP address,
- Data about your mobile device or computer, including browser details and language.

Sensitive data

We will not record sensitive data that relates to your health, ethnicity, religious beliefs or political opinions.

Data on children

We don't collect data on children.

3. What do we do with Your personal data?

We only use Your personal data for our legitimate, business-related reasons. This applies to the following circumstances:

- Administration: after creating an account, we are legally obliged to collect personal data that allows us to verify Your identity (e.g. phone number, e-mail address) and to contact You,
- Delivery of products and services: we use information about You to carry out the operation ordered by you,
- Marketing: We may send you e-mails or texts with an offers of products or services as long as you express your consent for that, for example, when you log in to our website or in our mobile applications. You may withdraw such consent at any time,
- Fraud prevention and detection, and data security: It is our responsibility to protect your personal data, prevent, detect and stop data breaches. This includes information we are required to collect about you, such as to comply with anti-money laundering, anti-terrorist financing and anti-fraud laws,
- We may process Your personal data in order to protect you from fraudulent activities, e.g. if you fall victim to identity theft, your personal data has been disclosed or a hacker has been hacked into your device.

4. With whom do we share your data and why?

State authorities

In order to comply with our regulatory obligations, we may disclose data to competent authorities, e.g. to counteract terrorism or money laundering. In some cases, we are required by law to share Your data with third parties, law enforcement agencies, such as the police, prosecutor's office, courts and arbitration/mediation bodies upon their explicit and lawful request.

Financial institutions

When you pay with a payment card, we need to share Your information with a financial institution such as, for example, Mastercard. Your name and surname as well as payment card number, address for shipping the goods.

Service Providers

When we use the services of other service providers, we only share personal data that is required for the respective order. Service Providers support us in activities such as:

- the provision of certain services and the execution of certain operations,
- design and maintenance of web tools and applications,
- marketing activities or events, and customer communication management,
- elaboration of reports and statistics, printing materials and product design.

In all such cases, we ensure that third parties only have access to the personal data that are absolutely necessary for the performance of that specific tasks.

Whenever we share Your personal data internally or with third parties in other countries, we apply the necessary safeguards to protect them. In this respect, Sparados relies on:

- standard contractual clauses adopted within the European Union,
(they concern the transfer of data by an entity within the EU outside the European Economic Area in order to ensure compliance with EU data protection regulations),
- the EU-US Privacy Shield Agreement, which protects personal data transferred to the United States.

5. Your rights and how we comply with them

We respect Your rights, as a customer, to specify how your personal data are used. These rights include:

Right of access to information

You have the right to contact us to receive a summary of the personal data we process.

Right to rectification

If your personal data is incorrect, you have the right to ask us to rectify it. If we share your information with a third party and such information is subsequently corrected, we will also notify that third party.

The right to lodge an objection to the processing

You can object to us using your personal data for legitimate reasons. You can do this via the Internet by sending an e-mail or to our office address. We will analyze your objection and whether the processing of your information has any undesirable effect on you, which requires us to stop such processing.

We will not be able to accept your objection to the processing of personal data in the following situations:

- if we are legally obliged to carry out such activities,
- if it is necessary for us in order to perform the contract concluded with You.

Right to restriction of processing

You have the right to ask us to restrict the use of Your personal data if:

- you believe the information is incorrect,
- we process data illegally,
- we no longer require such data, but you want us to keep it in case of claims,
- you object to the processing of Your data by us on the grounds of legitimate interests and this objection has been acknowledged by us.

Right to data portability

You have the right to ask us to transfer Your personal data directly to you or to another organization. This applies to personal data that we process in an automated manner and with your consent or on the basis of an agreement concluded between us. If technically feasible, we will transfer your personal data.

Right to deletion

You can ask us to delete your personal data if:

- we no longer need them for the purposes for which they were collected,
- you withdraw your consent to their processing and we have no other basis for their processing,
- you object to the processing of Your data by us for our legitimate interests, and there are no overriding legitimate interests for processing of data and this objection has been found justified, or for the purpose of sending commercial messages,
- we process your personal data unlawfully or the laws of the European Union or a Member State of the European Union require us to delete your personal data.

The right to lodge a complaint

If you are not satisfied with the way we have responded to Your concerns, You have the right to lodge a complaint with Sparados. If you are still unsatisfied with our response to such a complaint, you can forward it to the Sparados Data Protection Officer at the address provided in item 10 of the present statement.

6. How we protect Your personal information

To protect your information, we have internal policies and standards operating throughout our organization. We update such policies and standards periodically to maintain their continued compliance with regulations and market developments. In particular, and in accordance with the law, we take appropriate technical and organisational measures (policies and procedures, IT security measures, etc.) to guarantee the confidentiality and integrity of Your personal data as well as of the manner in which they are processed.

In addition, our employees are subject to confidentiality obligations and may not unlawfully or unnecessarily disclose Your personal data or the manner in which they are protected.

7. What can you do to help us protect Your data?

Protecting Your data is our utmost priority, we do our best, but there are some actions you can take yourself:

- install and keep updated Your anti-virus, anti-spyware and firewall software,

- never leave devices, or payment card unattended,
- if You lose your card immediately report it to the relevant services and block it,
- always log out of portals if you no longer use them,
- keep Your passwords strictly confidential and use so-called strong passwords, i.e. avoid obvious combinations of letters and numbers,
- be vigilant on the Internet and find out how you can recognise unusual activity, such as a new website address or phishing e-mails.

8. For how long do we store your personal data?

We may store Your personal data only for as long as necessary for the purposes for which we originally required them. After this time, we use available solutions, e.g. archiving.

9. Contact with Sparados

If you would like to learn more about our data policies and how we use Your personal data, you can contact us by e-mail. At the end of this document you will find contact details along with details of data protection authorities.

10. Scope of the Privacy Statement

This document constitutes the Privacy Statement of Sparados sp. z o.o. We may amend this Privacy Statement to maintain its compliance with any changes to the law or to reflect how the personal data is processed in our organization. This version was created on 31.10.2022

The latest version of the document is available at:

www.sparados.com

Contact details of the Data Protection Officer	Data protection authority
E-mail address: iod@sparados.com Sparados SA ul. Rusalka, 17a 20-103 Lublin with a note reading: DPO	Office for Personal Data Protection https://uodo.gov.pl/

Document version management

Number	Date	Revised by	Description of revision
1.0	31.10.2022	Sebastian Misiewicz	Creation of the document