

## BUSINESSCLICK PRIVACY POLICY

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This privacy policy is designed to help understand what data we collect, why we collect them and how we use them. This information is important, so please read this document carefully.

By using the services (hereinafter jointly “**Services**” or “**WP Services**” and separately as a “**Service**”) of Wirtualna Polska (hereinafter: “**WP**” or “**Wirtualna Polska**”), that is the entities from the Wirtualna Polska group, which consists of Wirtualna Polska Holding Spółka Akcyjna with its registered office in Warsaw and all its affiliates and subsidiaries, linked personally and through capital, directly or indirectly through other entities (hereinafter: “**Subsidiaries**”), including Wirtualna Polska Media Spółka Akcyjna with its registered office in Warsaw (hereinafter “**WPM**”), you entrust your data to us.

It also happens that you are entrusting the information also to our trusted partners (hereinafter: “**Trusted Partners**”), or the third parties that exist in our Service environment. We cooperate with them to provide you with top level Services. Others also include those who conduct marketing activities or those who directly or indirectly commission us to conduct marketing activities in our Service environment (hereinafter: “**Clients**”).

## What data do we process?

We process data that you provide, leave or to which we can get access during the use of WP Services, websites or applications, or the websites and applications of our Trusted Partners and in other locations on the Internet, including the data made available by you in your website and application search history.

We process data that are necessary in order to provide you with access to accounts or profiles in Services, such as, e.g. an e-mail address, first name, last name, age, sex, city, date of birth) that you give to us, for example as part of the forms or windows available in our Services, polls, questionnaires or surveys.

We also process data that you leave when using our Services (including data stored in cookies), data about visited websites, applications and content of interest to you (including advertising), your searches, your clicks, the way you use our Services, as well as data from websites of our Clients and Trusted Partners, including histories of your purchases, especially those made after clicking on advertisements delivered to you in our Service environment.

We process data on your activity within the services, portals, web services and applications of Wirtualna Polska, our Trusted Partners and other locations on the Internet, as well as information stored on the end-user devices that you use, including information on your browser and data about your approximate geographic location.

We process your personal data stored, among others in the cookie files installed in our websites and applications as well as in the websites and applications of our Trusted Partners and in other locations on the Internet outside of Wirtualna Polska's services, portals and websites. You can access information about personal data processing in such locations by clicking this link: [Trusted Partners](#).

The advertisements and editorials displayed will be targeted and profiled using your data.

Targeting is the process of selecting the audience most interested in the specified editorials and advertising content.

Profiling is the process of automated processing of your data that involves using your data to assess certain factors specific to you, in particular to analyze or predict your interests or other behavior, such as your online credibility, approximate location, movement, consumer or professional preferences.

The advertisements and editorials displayed will be targeted and profiled using the following of your data and using the following criteria:

- Your activity within the services, portals and websites and applications of Wirtualna Polska and our Trusted Partners, in particular the editorials that you use;
- Your activities and interactions with advertising;

- Your location, the size of the town/city you reside in;
- information stored on your end-user devices, such as the type of end-user device, browser type, operating system you are using, and the language set in the operating system you are using.

Information on your profile may be used to profile advertising and content in services, portals, websites and applications of Wirtualna Polska and of our Trusted Partners and in other locations on the Internet outside of Wirtualna Polska's services, portals and websites.

This applies in particular to the advertising networks that aggregate and intermediate in the sales of advertising. Advertising networks collect data on users from all websites cooperating with these networks and then use such data to display advertising that is best suited to your interests.

We also process data that you post yourself on the Services that we provide to you as part of "hosting" services; in this case, our data processing is limited to providing you with virtual space on which you post data yourself using the IT tools available within our Services.

The scope of data processed in the various WP Services may vary; you can always find information on this subject in the panel linked to the respective WP Service, or you can always contact our Data Protection Officer.

## Information about the controller

Your personal data controller is Businessclick sp. z o.o., with its registered office in Warsaw, at ul. Żwirki i Wigury 16, 02-092 Warsaw, entered in the Register of Commercial Undertakings under file number KRS 0000292126, NIP 8971735429.

Your personal data controllers also include **Wirtualna Polska** entities, that is the entities from the Wirtualna Polska group, which consists of Wirtualna Polska Holding Spółka Akcyjna with its registered office in Warsaw and all its affiliates and subsidiaries, linked personally and through capital, directly or indirectly through other entities, including Wirtualna Polska Media Spółka Akcyjna with its registered office in Warsaw, you entrust your data to us.

## Wirtualna Polska

### List of companies:

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WIRTUALNA POLSKA MEDIA S.A.

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WIRTUALNA POLSKA HOLDING S.A.

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WAKACJE.PL S.A.

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NOCOWANIE.PL SP. Z O. O.

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HOMEBOOK SP. Z O.O.

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TOTALMONEY SP. Z O.O.

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OPEN FM SP. Z O.O.

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BUSINESSCLICK SP. Z O.O.

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NETWIZOR SP. Z O.O.

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EXTRADOM.PL SP. Z O.O.

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SUPERAUTO24.COM SP. Z O.O.

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AUDIOTEKA S.A.

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Link to the webpage that contains registration and contact data of Wirtualna Polska companies: <https://holding.wp.pl/kontakt/dane-spolek-grupy>

## Data recipients

### Trusted Partners and others

Additionally, in light of the applicable law, your personal data controllers as part of the individual services will also include the **Trusted Partners**, including **Clients**. Trusted Partners include traditional companies operating on the advertising market and companies typical for modern forms of automatic purchase and sale of web advertising, with which Wirtualna Polska cooperates, including companies recommended by international industry organizations such as IAB (Interactive Advertising Bureau). The list of Trusted Partners along with their processing objectives for your data is available at this [link](#), while the list of the IAB Trusted Partners is available at this [link](#),

Our Trusted Partners include:

- advertisers who, directly or indirectly, outsource marketing and remarketing activities to us,
- e-commerce companies whose offering of goods and services you can find through Wirtualna Polska's services, portals and websites,
- media houses and advertising networks acting on behalf of our advertisers,

- brokers and other intermediaries operating on the Internet advertising market,
- interactive agencies specializing in Internet marketing,
- advertising networks operating in the Internet advertising market using programmatic technology, i.e. a model based on the automation of sales and purchases of Internet advertising, including:
  1. operators of platforms for collecting and managing data about you, which may be used by Wirtualna Polska, by Clients as well as advertisers cooperating with these platforms,
  2. operators of demand-side platforms, which are used by advertisers or media houses, advertising networks or agencies to buy advertising space,
  3. operators of supply-side platforms that enable Wirtualna Polska to offer sales of advertising space to advertisers, media houses, advertising networks or advertising agencies,

Advertising networks include, in particular, companies that provide services that automate sales and purchases of Internet advertising, such as platforms providing advertising space to advertisers, platforms collecting and managing user data for advertisers' needs and for the purchase of advertising space by advertisers with whom Wirtualna Polska cooperates.

- companies providing analytical services.

At the same time, we would like to point out that sometimes, for example due to the lack of direct relations with some of the Trusted Partners, especially those who are "Clients", for example when they order advertising to be placed on our space through the intermediation of a Trusted Partner who is an advertising network, we are not able to state their names for objective reasons.

Your personal data may be transferred to data processors that process personal data under engagement from the controller, which may include among others: IT service providers, payment service providers, marketing agencies, etc.; however, such data processors process data based on an agreement with the controller and solely in accordance with the controller's instructions. Your information may also be disclosed to entities authorized to receive it under applicable law, such as law enforcement authorities, if an authority makes such a request on an appropriate legal basis (e.g., as part of a pending criminal proceeding). In some cases, your information may be transferred to recipients in third countries, i.e., countries outside of the European Economic Area, if, for example, it is necessary to provide Services to you or if it is required by another valid legal basis. Information on this subject is available under each Service. Before transferring your personal data, we make sure that third countries, namely the countries outside the European Economic Area, provide an adequate level of protection for your personal data. However, in certain situations, the transfer of your personal data to third countries may entail risks due to the lack of a decision declaring an adequate level of protection outside the European Economic Area and the lack of safeguards and effective legal protection measures in third countries.

Our Trusted Partners also include entities from third countries, i.e. from countries outside the European Economic Area. Remember that by giving consent to the processing of your personal data by our Trusted Partners for marketing purposes (including for automated matching of ads to your interests and the measurement of their effectiveness), your voluntary consent is the basis for transferring your personal data outside the European Economic Area for marketing purposes. You can at any moment configure the Trusted Partners settings and prevent the processing of your personal data by Trusted Partners with registered offices outside of the European Economic Area.

In connection with the processing of your personal data by our Trusted Partners outside of the European Economic Area, we verify the guarantee of the high level of protection for such data and use standard contractual clauses for the transfer of personal data to data processors located in third countries. You have the right to request a copy of the standard contract by contacting the Data Protection Inspector.

Also, your personal data will be transferred outside the European Economic Area if it is necessary for the execution and performance of a contract between you and Wirtualna Polska, to take action at your express request prior to the execution of a contract between you and Wirtualna Polska. These actions are always sporadic.

The wp.pl domain collects, stores and shares information about the end user, including IP addresses, a unique ID and information enabling identification, from Wirtualna Polska web pages, websites or applications.

## **Social media plugins**

We use such technologies as social media plugins, including Facebook Social Plugin, by means of which social media service providers may access your data. Our websites feature the Like and Share buttons associated with Facebook. For this purpose, the code referring to Facebook is placed in the relevant sections and sites. By using the Like button or recommending an image or sections of a site, you are logging into Facebook, where the privacy policy in force is that of Facebook. You can familiarize yourself with this policy at <http://pl-pl.facebook.com/help/cookies>

Detailed information on the scope and purpose of processing your data within Facebook Social Plugin can be found at [https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0).

## **Data Protection Officer**

We have appointed a Data Protection Officer for the entire Wirtualna Polska. It is a person who can be contacted in all matters pertaining to the processing of personal data and the exercise of the rights related to the processing. If you want to contact the Data Protection Officer, use the contact data stated below:

Mailing address: Wirtualna Polska / Oskar Cisiński / IOD / Żwirki i Wigury 16, 02 – 092 Warsaw

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E-mail: [iodo@grupawp.pl](mailto:iodo@grupawp.pl)

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Form: [Fill in the form](#)

## What are the purposes and legal grounds for processing your personal data and for how long are they processed?

Purpose of data processing:	Legal basis:	Processing period:
performance of an agreement between the controller and the user (these agreements are usually bylaws that a user accepts before using a Service), which includes provision of Services to users, customization of Services to the needs of users, as required in order to provide Services to users, maintenance and assurance of technical support for the Services, as required to provide Services to users, analysis and improvement of Services, as required in order to provide Services to users (hereinafter: “ <b>provision of Services</b> ”)	Article 6(1)(b) of GDPR – as needed to perform the agreement to which the user is a party	until the specific agreement between you and WP expires, except that sometimes this data can be processed also after the expiry of that agreement, but only if it is permitted or required in light of the applicable law
customizing the Services to user needs (hereinafter: “ <b>optimization</b> ”), technical delivery of content, Services or advertising, maintenance and technical support of the Services, performance measurement of content, Services or advertising (hereinafter: “ <b>technical provision of Services</b> ”), statistical measurement, analysis and improvement of Services, use of market research to generate audience feedback (hereinafter: “ <b>statistics</b> ”); ensuring the security of Services, fraud prevention and error correction (hereinafter: “ <b>security</b> ”); marketing (including analysis and profiling of data for	Article 6(1)(f) of GDPR – legitimate interests of the controller, to enable promotion, development and ensure correct functioning of the Services provided	until an effective objection is raised, but no longer than 3 years

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marketing purposes) of the controller's products and services [that do not require consent](#) (hereinafter also: "**self-marketing**");

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marketing (including analysis and profiling of data for marketing purposes) concerning the products and services of third parties (hereinafter also "**third party marketing**"). Third party marketing includes, among others, the selection of basic ads, creation of a personalized advertising and content profile, selection of personalized advertising and content and advertising efficiency measurements.

Article 6(1)(a) – voluntary consent

until the consent is withdrawn

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preparation and delivery of answers to requests or other reports submitted to the controller

depending on the purpose for which the request or other report was submitted, this includes taking action leading to the execution of an agreement (Article 6(1)(b) of GDPR), a legal obligation (Article 6(1)(b) of GDPR in conjunction with Articles 15-22 GDPR), or a legitimate interest of the controller (Article 6(1)(f) of GDPR), which includes the ability to respond to a request or report.

until the response to a request or another report to WP is prepared and given; and in the case of reports concerning the exercise of rights of data subjects – 5 years after they are exercised or a response to the report is given.

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determination and pursuit of claims or defense against them

legitimate interests of the controller (Article 6(1)(f) of GDPR) involving the ability to determine, pursue or defend against claims.

until the claims expire, but no longer than 6 years after the end of the calendar year, in which the event that could become the basis for the claims arose

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Fulfillment of statutory duties arising under tax regulations and accounting regulations involving, among others, the necessity to issue and archive a bill

legal obligation (Article 6(1)(c) of GDPR in conjunction with Article 74 of the Accounting Act and other tax legislation)

5 years after the end of the calendar year, starting from the next year when the event causing the legal obligation to arise occurred

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Handling of requests and proceedings conducted by

Legal obligation (Article 6(1)(c) of GDPR in

until the request is satisfied

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authorized bodies, e.g. courts, prosecution offices, law enforcement authorities, offices that may be related to user data

conjunction with the regulations authorizing the relevant body to submit a request)

## Provision of the Services

We process your data without it being necessary for you to give consent in order to **provide the Service**.

In this case, the legal basis for processing your data is that it is necessary to provide the service.

As part of **the provision of the Services**, we may point to detailed purposes of data processing, which you can read about in [advanced settings](#):

- to customize the Services to the user's needs as required to provide the Services to the user,
- to maintain and ensure technical support for the Services as required to provide the Services to the user,
- deliver and present advertising and content as required to provide the Services to the user
- develop and improve services necessary to provide the Services for the user

to **provide the Services**, we use the following detailed features and special features:

- match and combine data from other data sources,
- link different devices,
- identify devices based on information transmitted automatically,

## Optimization, technical provision of the Services, statistics, security and self-marketing

Additionally, we process your data without you having to give consent for the purpose of **optimization, technical provision of the Service, statistics, and security** as well as **self-marketing** not related in any way to the **provision of the Service**.

The legal basis for processing your data is a lawful and legitimate interest of Wirtualna Polska which does not breach your rights, freedoms or individual interests. Wirtualna Polska's legitimate interest will constitute the ground for processing your data necessary to further it without the necessity for you to give consent as long as the equilibrium test conducted by Wirtualna Polska shows that such processing of your data by us is balanced with your rights, especially the rights to privacy and confidentiality.

As part of the **optimization, technical provision of the Service, statistics, security and self-marketing**, we may specify detailed purposes for data processing, which you can read about in [advanced settings](#):

- customization of the Services to the user's needs,
- [measure advertising performance](#),
- measure content performance
- Deliver and present advertising and content,
- maintenance and technical support for the Services,
- statistical measurements,
- develop and improve services,
- understand audiences through statistics or combinations of data from different sources,
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- ensure security, prevent and detect fraud, and fix errors

For the purposes of **optimization, technical provision of the Service, statistics, security and self-marketing**, we use the following detailed features and special features :

- match and combine data from other data sources
- link different devices,
- identify devices based on information transmitted automatically
- use precise geolocation data
- actively scan device characteristics for identification

### Third party marketing

Wirtualna Polska asks you to give consent for the purpose of processing your data, which is third party marketing. The consent is voluntary and you can [give it](#) by using the feature of the [consent management platform](#) and you may withdraw it at any time using [advanced settings](#) of the platform.

The purpose of the processing defined as **third party marketing** is described in [advanced settings](#) and it includes:

- Use limited data to select advertising
- Use limited data to select content
- Store and/or access information on a device

- create profiles for personalised advertising,
- create profiles to personalise
- use profiles to select personalised content
- use profiles to select personalised advertising

measure advertising performanceTo provide **third party marketing**, we use the following features and special features:

- match and combine data from other data sources,
- link different devices,
- identify devices based on information transmitted automatically
- ,

Please note that in justified cases, Wirtualna Polska may process your data without your prior consent.

Please note that we do not provide a mechanism to object to the processing of your data on the basis of Wirtualna Polska's legitimate interest using the consent management platform. If your data is processed based on a legitimate interest of Wirtualna Polska, you may object to the processing by contacting the Data Protection Officer:

Mailing address: Wirtualna Polska / Oskar Cisiński / IOD / Żwirki i Wigury 16, 02 – 092 Warsaw

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E-mail: [iodo@grupawp.pl](mailto:iodo@grupawp.pl)

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Form: [Fill in the form](#)

In relation to the processing of your data based on Wirtualna Polska's legitimate interest, we always perform a test of balance between our legitimate interest and your rights. Therefore you should remember that, for such fundamental purposes, features and special features as maintenance and ensuring technical support for the Services, ensuring security, preventing fraud and fixing errors, technical delivery of ads or content, statistical measurements, measurements of content or ad performance, your objection may be not effective.

### **Personal data processing by Trusted Partners**

Trusted Partners process your personal data, in particular based on your voluntary consent. Only in exceptional circumstances may they process your data without your prior consent.

Detailed purposes of processing of your personal data by the other Trusted Partners and the manner of informing them of your intention to exercise your rights can be found in the privacy policies of those Trusted Partners.

Detailed purposes of processing your data as part of third party marketing by Wirtualna Polska and our Trusted Partners can be found [here](#).

Provision of the data is voluntary; however, a failure to do so (including refusal to provide access to information and have the data stored on your device, including with the use of cookies) with regard to data marked as necessary to provide services for you will prevent their provision, in particular it will make it impossible for you to register and use the services, portals and websites of Wirtualna Polska and it will make it impossible for us to provide you with information, content and offers you are looking for, to process and respond to your complaint and to respond to your inquiry or some other request.

## What rights do you have?

You have the following rights in connection with our processing of your personal data:

- **the right to access your data** - the right to obtain from the controller confirmation that your personal data is being processed, including obtaining a copy of the data,
- **the right to request rectification of data** – the right to have inaccurate personal data corrected or incomplete data completed,
- **the right to erasure** – the right to have your personal data deleted if certain circumstances arise,
- **the right to lodge a complaint with a supervisory authority** for protecting personal data,
- **the right to restriction of processing of the data.**

If your data is processed on the basis of consent, you may additionally exercise the following rights:

- **the right to withdraw consent** to the extent that the data is processed on that basis. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

The consent is voluntary and you can [give it](#) by using the feature of the [consent management platform](#) and you may withdraw it at any time using [advanced settings](#) of the platform.

Wirtualna Polska provides you with the opportunity to grant consent and withdraw it using the platform registered and verified by IAB. We are registered in the Transparency & Consent Framework under the number **72**.

If your data is processed on the basis of consent or as part of a service provided (the data is necessary for the purpose of providing the service), you may additionally exercise the following rights:

- **the right to portability of personal data**, i.e. to receive your personal data from the controller, in a structured, commonly used machine-readable format. You can send the data to another data controller.

If your data is processed on the basis of a legitimate interest of the controller you may also exercise the following rights:

- **the right to object** to processing of data on the grounds relating to your particular situation.

Once you have effectively exercised your right to object, your data will not be processed unless there is a valid legitimate basis for processing that overrides your interests, rights and freedoms or a basis for establishing, asserting or defending claims. Your data will not be processed for self-marketing after you have filed the objection.

If your data is processed based on a legitimate interest of Wirtualna Polska, you may object to the processing by contacting the Data Protection Officer.

To exercise the above rights, please contact the data controller or the Data Protection Officer (contact data above).

## Cookies and other similar technologies

Wirtualna Polska and Trusted Partners upload information in the form of cookies or in a different form to end devices (e.g. computer, laptop, smartphone, Smart TV) and obtain access to information collected with the use of cookies and other technologies which identify end devices.

### What are cookies?

Cookies are pieces of data, in particular text files, which are stored on an end device of the user of the Services, including portals and websites or apps. Cookies contain the domain name of the website from which they originate, the time they are stored on the end device and a unique name. Information stored in cookies is often necessary for the proper operation of a website. Cookies may store a unique number that identifies the user's device, but the user's identity is not determined on the basis of the number.

A publisher's website may place a cookie on your browser if your browser allows it. Importantly, a browser only allows a website to access cookies placed by that website, not those placed by other websites.

### Why do we use them?

We use cookies and other similar technologies for the following purposes:

- to provide the Services;
- to adjust the contents of portals, services and apps to the user's preferences and optimizing the use of websites; e.g., cookies allow, in particular, for recognizing the user's device and displaying the website appropriately, adjusted to their individual needs;
- to compile statistics that help us understand how users use the Services and apps, which enables us to improve their structure and content; research and measurements of the audience of our Services, editorial content including advertisements in order to analyze, evaluate, introduce, improve and develop our Services, websites, services or apps; for this purpose we also create segments of Users, or the audience of particular Services and content or their categories;
- to maintain the user's session (after logging in), so that the user does not have to re-enter their login and password on each sub-page of a given website and app;
- to present advertisements, among others, in a manner that takes into account the user's interests or place of residence (customization of the advertising message) and with a guarantee of exclusion of the possibility of repeated presentation of the same advertisement to the user, remarketing consisting in displaying advertisements of Clients whose sites you have visited or whose goods or services you have been interested in, e.g. you clicked on the Client's advertisement earlier;
- to conduct surveys – especially in order to avoid presenting the same survey to the same audience multiple times and to present surveys in a way that takes into account the interests of the audience.
- to link multiple devices belonging to the same end-user to achieve one or more of the purposes described above.

### What types of cookies do we use?

In view of the lifespan of cookies and other similar technologies, we use two main types of these files:

- session cookies - temporary files stored on the user's end device until the user logs out, leaves the website and apps or shuts down the software (web browser);
- persistent cookies - stored in the user's end device for the time specified in the cookie parameters or until they are deleted by the user.

In view of the purpose of cookies and other similar technologies, we use the following types of cookies:

- necessary for the operation of the service and apps - allowing for using our services, such as authentication cookies used for services that require authentication;
- files that ensure security, e.g. those used to detect abuses concerning authentication;
- performance cookies - making it possible to collect information about how websites and apps are used;
- functional cookies - allowing for “remembering” the user’s selected settings and personalizing the user interface, e.g. with regard to the user’s chosen language or region of origin, font size, appearance of the website and apps, etc.;
- marketing cookies - making it possible to deliver advertising content to users more tailored to their interests;
- statistical cookies - used to count statistics about websites and apps.

To ensure the convenience of using our services, we use the Local Storage (LS) technology, whose operation is similar in principle to cookies, but with slightly different properties. LS is a separate part of the browser’s memory used to store data saved by services. Access to LS objects may be obtained only by a site operating on the same website from which the data was stored, but unlike cookies, these objects are not sent by the browser every time the server is referenced. The data in LS is stored long-term by the browser and is not deleted when the browser is closed and neither does it have a specific expiration time. We emphasize that we do not use this technology to “track” or identify users, but only for convenience and to provide the best possible service level. We use the LS technology, for example, to remember settings, retain radio configurations, or store data on recommended entries.

We use the Web Push technology to provide you with short current notifications, especially the latest news, information about our Services and offers from our Trusted Partners and Advertisers.

### Managing browser settings

Notifications are provided in real time and handled by the web browser you are using. For this reason, a unique identifier will be stored in your browser. In order to receive notifications from us, you must give consent to this. You can withdraw your consent to receive notifications at any time using your browser settings:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Chrome](#)

We process data about your approximate geographic location, and for this purpose, we use the technology provided by your web browser. We then use the approximate



geographic location data to achieve one or more processing purposes, such as providing you with information about the weather at your location, traffic information, presenting advertisements for restaurants nearby. We cannot use your approximate location data unless you give your consent.

You can withdraw your consent at any time using your browser settings:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Chrome](#)
- [Apple devices](#)

In addition, on our websites, we use technologies for statistical measurements coming from our Trusted Partners, especially Google Analytics and Gemius.

The above entities place special codes on your end devices that allow us to collect data used to count statistics and optimize our Services.

At any time a user may object to the collection of data by Google Analytics or Gemius by changing web browser settings.

Detailed information about the scope and purpose of processing your data and your rights can be found at the following links:

- [https://www.gemius.pl/pl/polityka\\_prywatnosci](https://www.gemius.pl/pl/polityka_prywatnosci)

You can also prevent Gemius from having access to information about your activity on our website using the solutions available here:

- <http://privacypolicy.gemius.com/pl/>

Additional information is available at: <http://www.gemius.pl/cookie-policy.html>

You can also prevent Google Analytics from having access to information about your activity on our website using the solutions available here:

- <https://tools.google.com/dlpage/gaoptout>

When you browse our websites or use our mobile apps or other Services and when you provide us with an email address (to log in, sign up for a newsletter or for similar purposes), we may share your personal data or other information we collect from you, such as your email address (in hashed, pseudonymized form), IP address, mobile advertising ID or information about the browser or operating system you are using, with our Trusted Partner LiveRamp, Inc. and companies from its group. LiveRamp uses the information to create an online identification code to recognize you on your devices. This code does not contain any personal data allowing for identification and will not be used by the Company for re-identification. We place this code in our site cookie or use a LiveRamp cookie and allow it to be used in online and cross-channel advertising. This code may be shared with our Trusted Partners to



make it possible for you to use content based on your interests or targeted advertising throughout your entire online experience (e.g., via websites, email, connected devices, apps, etc.). Trusted Partners may in turn use this code to combine demographic or interest-based information you have provided in your interactions with them. Detailed information on LiveRamp's data processing activities and how to withdraw consent/objection is available in the LiveRamp privacy policy at: <https://liveramp.com/privacy/service-privacy-policy/> . You have the right to withdraw consent or to object to the processing of your personal data at any time.

In many cases, software for accessing websites (web browser) by default allows the storage of information in the form of cookies and other similar technologies on the user's end device. A user may, however, change these settings at any time. A failure to make changes means that the aforementioned information may be placed and stored on the user's end device, and thus that we will store information on the user's end device and access that information. At the level of the browser used, a user may, for example, manage cookies on their own. Options offered by the most popular browsers include:

- accepting the use of cookies, which allows the user to take full advantage of the options offered by the websites;
- managing cookies at the level of individual websites chosen by the user;
- specifying settings for different types of cookies, for example, accepting persistent cookies as session cookies, etc..;
- blocking or deleting cookies.

Comprehensive information is available in the software (browser) settings. Selected details for those using particular web browsers:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Chrome](#)
- [Opera](#)
- Etc.

We would like to inform you that restricting or disabling the use of cookies and other similar technologies may affect some of the functionalities available in our services.

Additional information

Additional information on cookies and other technologies can be found, among other places, at [wszystkoociasteczkach.pl](http://wszystkoociasteczkach.pl), [youronlinechoices.com](http://youronlinechoices.com) or in the Help section in the browser's menu.

Please keep in mind that:

- when you use the same computer together with other users, when you finish using Wirtualna Polska services to which you are logged in, make sure to log out, i.e. "exit" your settings so that no one can see them;

- the data you provided at registration is known only to you and Wirtualna Polska. For our part, we guarantee that the data will not be disclosed to anyone, and you should also exercise caution when sharing it with third parties;
- it happens that people using the web want to “extract” information about you and use it against you or others. They may do so, for example, to make profit or to have what they think is fun. Be careful. Make sure that you know who the person asking you for personal data is and what kind of institution they represent. Remember that you are the one who is protected by relevant regulations, including data protection laws.

## Social media plugins

We use such technologies as social media plugins, including Facebook Social Plugin, by means of which social media service providers may access your data. Our websites feature the Like and Share buttons associated with Facebook. For this purpose, the code referring to Facebook is placed in the relevant sections and sites. By using the Like button or recommending an image or sections of a site, you are logging into Facebook, where the privacy policy in force is that of Facebook. You can familiarize yourself with this policy at <http://pl-pl.facebook.com/help/cookies>

Detailed information on the scope and purpose of processing your data within Facebook Social Plugin can be found at [https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0).

Wirtualna Polska and Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Irlandia) are co-controllers of personal data in accordance with Article 26 of the GDPR with respect to the processing of data for statistical purposes. Co-administration includes aggregate data analysis for the purpose of displaying activity statistics for users of Wirtualna Polska fanpages.

The scope of responsibility of Meta Platforms Ireland for processing your personal data for the following purposes:

- having a legal basis for processing data for the site’s statistics;
- ensuring that rights of data subjects are exercised;
- reporting violations to the supervisory authority and notifying affected persons of incidents;
- providing appropriate technical and organizational measures to ensure the security of personal data.

The scope of responsibility of Wirtualna Polska for processing personal data:

- having a legal basis for processing data for statistical purposes;

- performing information duties concerning purposes of processing pursued by Wirtualna Polska
- providing contact details and contact details of the Data Protection Officer

Meta Platforms Ireland will provide the essential content of the attachment with statistics to data subjects (Article 26(2) of the GDPR) using the data found in the [Information about Page Insights data](#).

The main supervisory authority for joint data processing is the Irish Data Protection Commission (regardless of the provisions of Article 55 (2) of the GDPR, if applicable).

Detailed information on mutual arrangements between the controllers is available at: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

Rules for personal data processing by Meta Platforms Ireland are available at: <https://www.facebook.com/privacy/explanation>