

PRIVACY AND COOKIES POLICY

I.

PRIVACY POLICY

WHAT IS A PRIVACY POLICY?

We would like to familiarise you with the details of our processing of your personal data to give you **full knowledge and comfort** in using our Internet site. As we operate in the Internet industry ourselves, **we know how important it is to protect your personal data**. Therefore, we make **every effort** to protect your privacy and the information you provide to us. We carefully select and use appropriate technical measures, especially those of a **programming and organisational** nature, ensuring the protection of the personal data we process. Our website uses encrypted data transmission (SSL), which ensures that the data identifying you are protected. In our Privacy Policy, you will find **all the most important information on how we process your personal data**. You are kindly requested to read it. **It will take you no more than a few minutes**.

WHO IS THE WEBSITE ADMINISTRATOR?

The website on mastermediafood.com is administrated by **MASTERMEDIA Cioczek i Wójciak Sp. J.** having its registered office in Lublin at the following address: ul. Wojciechowska 9B, 20-704 Lublin, entered in the Register of Entrepreneurs of the National Court Register (KRS) maintained by the District Court in Lublin, under the KRS number: 0000447072, using the following NIP [*Taxpayer ID No.*]: 7120155884.

PERSONAL DATA

What legal act governs the processing of your personal data?

We collect and process your personal data in accordance with the provisions of the **Regulation of the European Parliament and of the Council (EU) 2016/679 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 (General Data Protection Regulation) (OJ EU L 119, p. 1)**, commonly referred to as: **GDPR**.

Who is the controller of your personal data?

The controller of your personal data is **MASTERMEDIA Cioczek i Wójciak Sp.J.**, ul. Wojciechowska 9B, 20-704 Lublin, **KRS: 0000447072**, **REGON** [*Business ID No.*]: 430299173, hereinafter: "MASTERMEDIA"

In any matters relating to your personal data, **you can contact us** by:

- e-mail: data@mastermediafood.com

What are the personal data we process and for what purpose?

You are offered a range of services on our website. For this purpose, we process different personal data, under different legal bases.

Purpose	Personal data	Legal basis for processing	Data retention period
Taking actions the user's request as specified in the contact form	first name, surname, e-mail address	Article 6(1)(f) of GDPR, i.e., processing for the purpose of pursuing our legitimate interest, consisting in maintaining continuity of communication and enabling contact with MASTERMEDIA in matters relating to our business activities	until you withdraw your consent to the processing of your personal data or object to such processing

Marketing of our own products and services	first name, surname, e-mail address	Article 6(1)(f) of GDPR i.e., processing for the purpose of pursuing our legitimate interest	until you withdraw your consent to the processing of your personal data or object to such processing
Establishment, exercise and enforcement of legal claims, and defence against legal claims in proceedings before courts and other state authorities	first name, surname, address of residence, PESEL [<i>personal identification number</i>], NIP, REGON, e-mail address, telephone No., IP No., bank account No., payment card No	Article 6(1)(f) of GDPR, i.e., processing for the purpose of pursuing our legitimate interest, consisting in the establishment, exercise and enforcement of legal claims and the defence against legal claims before the courts and other state authorities	until the expiry of the period of limitation for legal claims concerning contract performance
Compliance with the legal obligations established by law, in particular the provisions of tax and accounting law	first name, surname, business name, PESEL, NIP or REGON, e-mail address, telephone No., correspondence address, payment card No.	Article 6(1)(c) of GDPR, i.e., the processing is necessary for ensuring the compliance with our legal obligations, in particular with the provisions of tax and accounting law	until the expiry of the legal obligations imposed on the Controller which have justified the processing of personal data

Recipients of your personal data

Mastermedia may share your personal data with:

- Entities within the group to which Mastermedia belongs, i.e., Mastermedia UK Ltd, Mastermedia GmbH, Mastermedia B.V. and Mastermedia (IE) Limited,
- Companies providing legal, debt collection and accounting services,
- Companies providing marketing services,
- State authorities and other entities authorised under specific laws,

Your personal data are provided on a voluntary basis

Providing your personal data is voluntary but necessary for us to provide you with our services.

Automated decision-making (including profiling)

In principle, we do not make any decisions regarding you by automated means, including profiling. **The exception to this is when you use the contact form.** In connection with cooperating with a provider of marketing services that automate the analysis of customer traffic on the website, the delivery of marketing content, the personalisation of the offers presented or the handling of e-mail marketing (by sending newsletters), your data may be subject to automated processing of personal data in order to present you with personalised offers and content. You may object to such profiling at any time.

Will we transfer your personal data outside the EEA or to an international organisation?

Your personal data will not be transferred to any international organisation. However, they may be transmitted to our partners that provide us with marketing services, such as Google Ads, SALESmanago, Google Analytics or Pixel Facebook, in connection with the provision of marketing services by these entities.

What rights do you have in relation to our processing of your personal data?

Under the provisions of GDPR, you have the following rights:

- the right to request **access** to your personal data

- the right to request **rectification** of your personal data
- the right to request **erasure** of your personal data
- the right to request **restriction** of the processing of your personal data
- the right to **object** to the processing of your personal data
- the right to **withdraw** your consent to the processing of your personal data
- the right to request **portability** of your personal data

If you make any of the above-mentioned requests to us, we will inform you without undue delay – and in any case **within one month of receipt of the request** – of the actions taken in relation to your request. We may extend that period by **two further months** where necessary, taking into account the complexity and number of the requests. In any case, we will inform you **within one month of receipt of the request** about the extension and give you the reasons for the delay.

Right of access to personal data (Article 15 of GDPR)

You have the right to be informed whether we process your personal data.

If we process your personal data, you have **the following rights**:

- the right of access to your personal data,
- the right to acquire information about the purposes of processing, the categories of personal data processed, the recipients or categories of recipients of such data, the intended period of storage of your data or the criteria for determining that period, your rights under the GDPR and your right to lodge a complaint with the DPA, the source of such data, automated decision-making, including profiling, and the safeguards applied in relation to the transfer of such data outside the European Union,
- the right to receive a copy of your personal data.

If you wish to **request access to your personal data**, send your request to: data@mastermediafood.com

Right to rectification of personal data (Article 16 of GDPR)

If your personal data are **inaccurate**, you have the right to request us to **rectify** your personal data without undue delay. You also have the right to request us to **complete** your personal data. If you wish to **request rectification or completion of your personal data**, send your request to: data@mastermediafood.com.

Right to erasure of personal data ('right to be forgotten') (Article 17 of GDPR),

You have the right to request **erasure of your personal data** if:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you have withdrawn your consent, to the extent that your personal data have been processed based on that consent;
- your personal data have been unlawfully processed;
- you have objected to the processing of your personal data for direct marketing purposes, including profiling, to the extent that the processing of your personal data is related to direct marketing;
- you have objected to the processing of your personal data in connection with processing necessary for the performance of a task carried out in the public interest or processing necessary for the purposes of legitimate interests pursued by us or a third party.

Despite your request to erase your personal data, we may continue to process your data for the purpose of **establishment, exercise or defence of legal claims**, of which you will be informed. If you wish to **request erasure of your personal data**, send your request to: data@mastermediafood.com

Right to request restriction of the processing of personal data (Article 18 of GDPR)

You have the right to request restriction of the processing of your personal data if:

- you contest the accuracy of your personal data, in which case we will restrict the processing of your personal data for a period enabling us to verify the accuracy of the data;
- the processing of your data is unlawful, and instead of erasure of your personal data, you request the restriction of the processing of your personal data;
- your personal data are no longer needed for the purposes of the processing but they are required for the establishment, exercise or defence of legal claims;
- you have objected to the processing of your personal data pending the verification whether our legitimate grounds override those specified in your objection.

If you wish to **request restriction of the processing of your personal data**, send your request to: data@mastermediafood.com

Right to object to the processing of personal data (Article 21 GDPR)

You have the right to **object** at any time to the processing of your personal data, including profiling, in connection with:

- processing necessary for the performance of a task carried out in the public interest or processing necessary for the purposes of legitimate interests pursued by the Data Controller or a third party;
- processing for direct marketing purposes.

If you wish to **object to the processing of your personal data**, send your request to: data@mastermediafood.com

Right to withdraw consent to the processing of personal data (Article 17 of GDPR)

If we have received your consent to the processing of your personal data, you have the right to withdraw it at any time. In accordance with your request, **we will** no longer process your personal data, unless **we are required** under applicable law to process them for the purpose specified by law.

If you wish to **withdraw your consent to the processing of your personal data**, send your request to: data@mastermediafood.com

Right to request portability of personal data (Article 20 of GDPR)

You have the right to **receive** your personal data from us in a structured, commonly used and machine-readable format, and to transmit those data to another data controller. By default, we will make your personal data available to you in **CSV format**. If you prefer to have your data made available to you in **another format**, please indicate your preferred format in the request. Where possible, we will endeavour to make your data available to you in your preferred format. You can also request us to transmit your personal data **directly** to another controller (where technically feasible). If you wish to **request portability of your personal data**, send your request to: data@mastermediafood.com

Lodging a complaint with the supervisory authority

If you believe that the processing of your personal data violates data protection regulations, you have the right to **lodge a complaint with the supervisory authority** – the President of the Office for Personal Data Protection.

II. COOKIES POLICY

1. The Website uses cookies only after you have given your consent to do so.
2. **Cookie files (or “cookies”)** are IT data, in particular text files, which can be stored on the Website User’s terminal equipment and are intended for using the Website.
3. Cookies usually contain the name of the website they originate from, their retention time on terminal equipment, and a unique number. The Website Administrator is the entity that places cookies on the Website User’s terminal equipment and obtains access to them.
4. Cookies are used for the following purposes:
 - adapting the Website content to the User’s preferences and optimising the use of the webpages; in particular, these files ensure that the Website User’s device is recognised and the webpage is properly displayed, in accordance with the User’s individual needs;

- compiling statistics that help us understand how the Website Users use the webpages, which makes it possible to improve their structure and content;
- maintaining the Website User's session (after logging in), which makes it unnecessary for him/her to re-enter his/her login and password on each sub-page of the Website;
- providing Users with advertising content corresponding to their individual preferences.

4. Two elementary types of cookies are used within the Website: session cookies and persistent cookies. Session cookies are temporary files which are stored on the User's terminal equipment until logging out, leaving an Internet site or shutting off the software (web browser). Persistent cookies are stored on the User's terminal equipment for the time specified in cookies parameters or until the User removes them.

5. The following types of cookies are used within the Website:

- a) "strictly necessary" cookies which make it possible to use the services available on the Website, e.g., authentication cookies used for services that require authentication within the Website;
- b) cookies which serve the purpose of ensuring security as regards the authentication within the Website;
- c) "performance" cookies which make it possible to collect information on how the Website is used;
- d) "functionality cookies" which make it possible to "remember" the settings chosen by the User and to personalise the User interface, e.g., as regards the selected language or region which the User comes from, font size, Website appearance, etc.;
- e) "advertising cookies" which make it possible to provide Users with the advertising content that is better tailored to their interests.

6. Details about cookies, including their retention time within the Website, are contained in the cookie settings. You can change the cookie settings of your browser at any time, which may also include removing cookies and disabling their re-installation.

Depending on the browser you use, the options for removing or withdrawing the consent to the installation of cookies may vary. Below you will find links to sample instructions.

- Chrome (<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=pl>)
- Internet Explorer (<https://support.microsoft.com/pl-pl/help/278835/how-to-delete-cookie-files-in-internet-explorer>)
- Firefox (<https://support.mozilla.org/pl/kb/usuwanie-ciasteczek-i-danych-stron-firefox?redirectlocale=pl&redirectslug=usuwanie-ciasteczek>)
- Opera (<https://help.opera.com/pl/latest/web-preferences/#cookies>)
- Microsoft Edge (<https://support.microsoft.com/pl-pl/microsoft-edge/wy%C5%9Bwietlanie-i-usuwanie-historii-przegl%C4%85darki-w-programie-microsoft-edge-00cf7943-a9e1-975a-a33d-ac10ce454ca4>)
- Safari (<https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>)

7. Analytical and marketing tools employing cookies that we use:

(a) **Google Analytics** – measurement of user traffic on the websites.

Detailed information on the protection and conditions of use can be found on: <https://marketingplatform.google.com/about/analytics/terms/pl/>

(c) **Google Ads** – Google collects cookie data on its servers to technically enable personalised marketing content to be displayed on other sites visited by the user and/or in the browser. The tool also makes it possible to measure the effectiveness and efficiency of the ads used.

Details on how Google uses cookies to display advertising content and how to manage your settings are available on: <https://policies.google.com/technologies/ads?hl=pl>

Partner's Privacy Policy: <https://policies.google.com/privacy>

(d) **Google Tag Manager** – the Google Tag Manager tool is used as part of Google Analytics and Google Ads. Its purpose is to manage advertising campaigns and measure their effectiveness.

e) **Facebook Pixel** – the so-called “Facebook conversion pixel” allows the effectiveness of advertising content to be assessed, and marketing campaigns to be managed on Facebook and Instagram, based on analysing the actions taken by users on our Website. The pixel data are used, *inter alia*, for analysing the actions taken by users on the Website.

Facebook's processing of data by means of this tool is part of Facebook's data policy: <https://pl-pl.facebook.com/privacy/explanation>

Details of how the Facebook pixel works can be found on: <https://www.facebook.com/business/help/651294705016616>

You may oppose to the capture of your data by Facebook Pixel and its use for the display of advertising content on social networks at any time. You may specify the type of advertisement that is displayed on social networks by entering the page set up by Facebook and by following the instructions provided on: <https://www.facebook.com/settings?tab=ads>

g) SalesManago

This tool, provided by Benhauer sp.z o.o., makes it possible to measure user traffic and activity on the Website, send mailings, and segment users according to their activity on the Website.

For more information, visit the partner's site available on: <https://pomoc.salesmanago.pl/monitorowanie-kontaktow-zasada-dzialania-i-zakres-zbieranych-informacji/>

(h) Social plugins.

Social Plugins are provided on our Website as links that connect the user's visit to our Website to a particular Social Media Platform of a Third-Party Provider. The Social Plugin will notify the Third-Party Provider that a User has visited our Site, and may also allow the Third-Party Provider to read information from the cookies it has previously sent to the user's computer. By visiting our social media profile, the User enters an external service, where the data processing rules set by that service apply.

Facebook – you can read the privacy policy on: <http://pl-pl.facebook.com/help/cookies>

YouTube – the rules on privacy protection can be found on: <https://policies.google.com/privacy>

LinkedIn – the rules on data processing are available on: <https://www.linkedin.com/legal/privacy-policy>

Instagram – the rules on data processing are available on: <https://help.instagram.com/519522125107875>

8. For more information on what cookies are, visit www.aboutcookies.org (in English) or <http://wszystkoociasteczkach.pl> (in Polish).

If you have any further questions or doubts, please contact us via: data@mastermediafood.com