



## **PRIVACY POLICY**

### **Personal Data Controller**

According to Article 13 it. 1 and 2 of the general regulation on the protection of personal data of 27 April 2016 (Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC, hereinafter referred to as "GDPR"), please be advised, that:

Your personal data controller is **ASSAY MANAGEMENT Spółka z ograniczoną odpowiedzialnością [Limited Liability Company]** with its registered seat in Warsaw (postal code: 02-677) at ul. Cybernetyki 19B.

You may contact the data controller via e-mail: [iod@assay.pl](mailto:iod@assay.pl) or in writing to the address of the controller's registered seat: **ul. Cybernetyki 19B, 02-677 Warsaw**

### **You may contact the Data Protection Inspector at:**

The controller has appointed the Data Protection Inspector, Dariusz Chmielewski, whom you can contact via e-mail: [IOD@ASSAY.PL](mailto:IOD@ASSAY.PL) or in writing to the address of the data controller. You may contact the Data Protection Inspector in all issues relating to the processing of personal data, the exercise of rights related to data processing and in all other issues where it is appropriate to contact the DPI in accordance with the GDPR.



## The purpose of personal data processing and the period of these data processing

Your personal data will be processed for the purpose of:

- a) the use by you of the services of ASSAY MANAGEMENT Sp. z o. o. (on the basis of Art. 6 it. 1 lit. a) and b) of the GDPR) including the providing services by electronic means and establishing business relations with you, as well as presenting you with commercial offers in order to conclude an agreement - for the period of performing these services, but no longer than until the date of withdrawal of consent to the processing of personal your data ,
- b) meeting the legal obligations incumbent on ASSAY MANAGEMENT Sp. z o.o.,  
in particular obligations under the Act of 9 October 2015  
on the performance of the Agreement between the Government of the Republic of Poland and the Government of the United States of America on improving the fulfillment of international tax obligations and the implementation of the FATCA legislation, the Act of 9 March 2017  
on the exchange of tax information with other countries (CRS), as well as tax and accounting liabilities (on the basis of Art. 6 it. 1 lit. c) of the GDPR) - for the period necessary to implement the above-mentioned obligations of the Personal Data Controller;
- c) fulfillment of obligations related to counteracting money laundering and terrorist financing based on the obligations under the Act of 1 March 2018 on Counteracting Money Laundering and Terrorism Financing (on the basis of Art. 6 sec, 1 lit. c of the GDPR); - for the period necessary to implement the above-mentioned obligations of the Personal Data Controller,
- d) considering complaints on the basis of the obligation under Art. 3-10 of the Act of 5 August 2015  
on Complaints examination by financial market entities and on the Financial Ombudsman (on the basis of Art. 6 sec, 1 lit. c of the GDPR); - for the period necessary to implement the above-mentioned obligations of the Personal Data Controller,
- e) Your data may also be processed for such purposes as: verifying the identity of customers and their representatives, meeting the obligations related to monitoring and reporting in accordance with tax legislation, counteracting misselling, i.e. offering customers products that do not match their needs, assessing the level of customers' knowledge in terms of classifying them as professional and retail ones within the understanding of the Act of 27 May 2004 on investment funds and management of alternative investment funds and performance of other obligations arising from the above-mentioned Act - for the period necessary for the implementation of the above-mentioned obligations of the Personal Data Controller,

- f) archival (evidence) which are the implementation of the legally justified interest of securing information by the Controller in the case of a legal necessity to provide facts, e.g. in court proceedings (Art. 6 it. 1 lit. f of the GDPR) - for the period necessary to implement the above-mentioned obligations of the Personal Data Controller;
- g) possible determination, investigation or defense against claims that are the implementation of the Controller's legally justified interest (on the basis of Art. 6 it. 1 let. f of the GDPR) - until the claims are statute-run;
- h) conducting marketing activities, in particular providing (including e-mail address, telephone) commercial information, offers (on the basis of art. 6 it. 1 let. a and let. b of the GDPR) - until the consent is withdrawn or until the activities undertaken before the conclusion of the agreement are finalized;
- i) monitoring the quality of services, internal analyzes and conducting customer satisfaction surveys (on the basis of art. 6 it. 1 let. a and lit. f of the GDPR) - until the consent is withdrawn, but not earlier than before the end of the duration of the agreement, the Server logs are processed in according to art. 6 it. 1 let. f of the GDPR in the legally justified interest of the controller, which is facilitating the use of services, improving the quality and functionality of the services provided, and the processing of these data does not violate the rights and freedom of users thereof (in the scope defined underneath: "Server Logs").

#### **Access to personal data (recipients of personal data)**

The recipients of your personal data are entities to which personal data are transferred by ASSAY MANAGEMENT Sp. z o. o., including entities providing consulting, auditing, accounting, legal, IT, archiving and destroying documents, marketing services, as well as statutory auditors in connection with auditing, employees and associates and the Controller's contractors.

#### **Your rights**

You have the right to:

- a) to access the content or your personal data.
- b) to rectify personal data;
- c) to delete personal data;



- d) to demand restriction of the processing of your personal data;
- e) to transfer the data
- f) to lodge objection to the data processing,

If the processing of personal data takes place on the basis of consent, you have the right to withdraw the consent to the processing of personal data at any time, which does not affect the lawfulness of the processing, which was performed based on the consent before its withdrawal. You may withdraw your consent for the the processing of personal data in the following way:

- a) in writing to the following address: ASSAY MANAGEMENT Sp. z o. o.,  
02-677 Warsaw, ul. Cybernetyki 19B
- b) by e-mail to the address: [iod@assay.pl](mailto:iod@assay.pl)

#### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you believe that the processing of your personal data violates the provisions of the GDPR.

#### **Office of the President of the Personal Data Protection (PUODO)**

Address: 00-193 Warsaw, ul. Stawki 2

Phone: (22) 531 03 00

#### **Authorization to collect personal data**

It is voluntary to provide your personal data, however it is necessary to make contact with you, including to conclude an agreement with ASSAY MANAGEMENT Sp. z o. o. on the basis of the legal obligations incumbent on the personal data controller. Failure to provide personal data will prevent contact and conclusion of the agreement.

**ASSAY Management a limited liability company** with registered seat in Warsaw,  
ul. Cybernetyki 19B, 02-677 Warszawa, REGON: 382740270, NIP: 5213858838, District Court for the capital  
city of Warsaw in Warsaw, 13-th Commercial Division of the National Court Register: 0000774998, share  
capital: PLN 60,000.00



### **Transfer to any third country**

ASSAY MANAGEMENT Sp. z o. o. orders the execution of particular services and tasks to selected service providers based outside the European Economic Area of the EU, Norway, Liechtenstein and Iceland (in a "third country"). In such cases, the data are transferred to a third country based on the decision of the European Commission stating an adequate level of protection, and in the event of failure to establish it, in compliance with the legal requirements, appropriate safeguards are applied to establish an adequate level of data protection - these include, in particular, standard EU contractual clauses. You have the option at any time to request further information and to obtain a copy of the appropriate safeguards.

### **No automated decision making**

Based on your personal data, the controller will not make any automated decisions regarding you, including decisions resulting from profiling.

Please be advised, that we pass the information for informational purposes only. You are not required to take any action or contact with us.

### **Analyses and use of the information**

With the aim to improve the quality of their services, the controller processes statistical information on the use of the online contact form and for this purpose uses statistical information provided by cookies or other similar technologies. Detailed information on the use of cookies files by the controller can be found underneath:

### **The website uses cookie files**

The cookie files are IT data, are in particular the text files that are stored in the Service User's device, which are used to view the websites. The cookie files usually contain the name of the website from which they originate, their storage time on the user's end device, as well as a unique number.

The entity that establishes the cookie files on the User's end device and obtains access thereto is the website operator or entities cooperating with them (eg., suppliers of the visit statistics system).

The cookie files are used to create statistics that facilitate the understanding of how the website Users make use of the websites, which allows for improving the structure as well as content thereof.

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As part of the [www.assay.pl](http://www.assay.pl) site, there are two basic types of cookie files: the session cookies and the persistent cookies. Session cookies are temporary files that are stored in the User's end device until logging out, closing the website or closing the software (web browser). Persistent cookies are stored in the User's end device for a period defined in the cookie file parameters until they are deleted by the User.

Software for browsing websites (internet browser) usually allows for storing cookies on the User's end device by default. The Website Users may introduce changes of settings in this regard. The web browser allows for deleting the cookies. It is also possible to automatically block cookies. More detailed information on this subject is provided in the help section or documentation of the web browser.

Restricting the use of cookies may influence some of the functions available on the Website sites.

The cookie files are stored on the User's end device and may also be used by advertiser clients and partners cooperating with the website operator, as well as payment operators. We recommend that you read the privacy policies of these companies to get to know the cookies policy used for statistics: Google Analytics privacy policy.

- <https://policies.google.com/privacy?hl=pl>

In terms of information about the User's preferences collected by the Google network, which provides visit statistics for the Controller, the User may view and edit information resulting from Cookie files using the tool:

- <https://www.google.com/ads/preferences/>

In many cases, the software used for browsing websites (web browser) allows storage of information in the form of cookies and other similar technologies on the User's end device by default. The User may, however, change these settings at any time. Failure to introduce any changes means that the above-mentioned information may be posted and stored on their end device, and thus that we would store information on the User's end device and access that information. It is possible, for instance, to independently manage cookie files from the level of the User's web browser. The most popular browsers include the possibility:

- to accept the Cookie files support, that allows the User to take full advantage of the options offered by the website;



- managing cookie files at the individual level, selected by the User of the website;
- specifying settings for various types of Cookie files, for example accepting permanent files as session files, etc.;
- blocking or deleting Cookie files.

### **Where can I go for help?**

Comprehensive information is available in the software (web browser) settings. Details for people using particular web browsers, including:

[Internet Explorer](#)

[Mozilla Firefox](#)

[Chrome](#)

[Opera](#)

Please be advised that limitations or exclusions of the use of Cookie files and other similar technologies may affect some of the functionalities available on our website.

### **Additional information**

Additional information on the Cookie files and other technologies can be found, e.g. at [wszystkooociasteczkach.pl](http://wszystkooociasteczkach.pl), [youronlinechoices.com](http://youronlinechoices.com) or in the Help section of the web browser menu.

### **Server Logs**

Information about certain activities of Users are subject to logging to the server. This data are used solely to administer the Website [www.assay.pl](http://www.assay.pl) and provide the most efficient handling of the provided hosting services.

The data saved in the server layer (using tools provided by the Server controller) are most often used in the event of a hack into Server or website damage on purpose. Then, on the basis of such data, the police are able to determine the perpetrator of the breach on the Server.

The resources which are browsed are identified through URL addresses. In addition, the following information may be recorded:

- time of arrival of the inquiry; o time of sending the answer; o name of the customer's station;

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- identification performed by the HTTP protocol;
- information about errors that occurred during the execution of HTTP transaction,

the URL address of the page previously visited by the user (referrer link) - in case when the access to the Website page was established via a link;

- information about the User's browser; information about the IP address.
- The data referred to above are not associated with particular visitors on the website.
- The above mentioned data is used only for server administration purposes.

These data are processed in accordance with Art. 6 it. 1 let. f of the GDPR in the legally justified interest of the controller, which is facilitating the use of services, improving the quality and functionality of the services provided, and the processing of these data does not violate the rights and freedom of users thereof.

These data are processed as part of the controller's current activities, however not longer than 60 days upon obtaining the information. After that time, the controller may further process general statistical data that will be devoid of any information about individual users.

***Please be advised, that we pass the information for informational purposes only.  
You are not required to undertake any action, or contact us.***