# **PRIVACY POLICY**

## https://rova.pl/

#### I. General information

This website privacy policy applies to the website <u>https://rova.pl/</u>. The data controller is the company ROVA SYSTEMS Sp. z o.o., Ul. Salwatorska 14/310, 30-109 Kraków, Vat number: 6772423637. Contact details: ul. Balicka 263, 30-198 Kraków, phone: +48 12 421 03 33, <u>info@rova.pl.</u>

#### II. Personal information

- Personal information collected by the Controller shall be processed 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 individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (GDPR), current Polish Data Protection Act, the Act on Rendering Electronic Services of 18 July 2002.
- Moreover, the Controller may record the information about connection parameters, like IP addresses, for technical purposes, for server administration and for collection of general, statistical demographic information (e.g. about the region from which the connection comes), and also for security purposes.
- 3. The Controller shall make an extra effort in order to protect privacy and information about the Online Users provided to him. The Controller shall exercise due diligence when selecting and applying appropriate technical measures, including those of programming and organizational nature, in order to protect the processed data, and in

particular he shall protect the data from unauthorized access, disclosure, loss and destruction, unauthorized modification, and also from their processing with the breach of the applicable provisions of law.

- Personal data will be processed in accordance with the principles of art. 5 GDPR.
  Personal data will be:
  - a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
  - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) GDPR, not be considered to be incompatible with the initial purposes ('purpose limitation');
  - adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
  - d) accurate and, where necessary, kept up to date ('accuracy');
  - e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) GDPR subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
  - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
- 5. As part of the Controller 's use of the tools supporting his current activity, provided by e.g Google Customer's Personal Data may be transferred to a country outside the European Economic Area(EEA), in particular to the United States of America (USA) or another country where an entity cooperating with it maintains tools for processing Personal Data in cooperation with the Controller.

- 6. Whenever we transfer your personal data out of the EEA, we attach a similar degree of protection to it (as it would receive in the EEA) by ensuring at least one of the following safeguards is implemented:
  - a) We will only transfer your personal data to countries, territories or sectors within a country that have been deemed to provide an adequate level of protection for personal data by the European Commission.
  - b) The transfer is subject to a legally binding and enforceable commitment on the recipient to protection the personal data (e.g. through the use of European Commission approved standard contractual clauses).
  - c) The transfer is made subject to binding corporate rules.
  - d) The transfer is based on a derogation from restrictions on transferring personal data outside of the EEA (such as where you give your consent, the transfer is necessary for the performance of contract with you, or the transfer is necessary for the establishment, exercise or defence of legal claims).

#### III. Legal basis

- Providing personal data is voluntary. Personal data collected through the contact form include such information as: first name and last name, contact phone, e-mail address and are used to identify the User/Customer, establish commercial contact with them, presenting an offer or conducting business negotiations with the Customer and possibly signing and performing the contract and for the purpose of recruitment.
- 2. Personal data collected on the website <u>https://rova.pl/</u> are processed primarily on the basis of the consent of the person (Article 6 (1) (a) of the GDPR), as well as on the basis of Article 6 (1) (.b) of the GDPR, i.e. their processing is necessary for the performance of a contract to which the data subject is a party or to take action at the request of the data subject, before the conclusion of the contract.
- After expressing separate consent, pursuant to art. 6 par. 1 (a) GDPR data may also be processed for the purpose of sending commercial information by electronic means or making telephone calls for direct marketing purposes respectively in connection with art. 10 para. 2 of the Act of 18 July 2002 on the provision of electronic services or art. 172 para. 1 of the Act of 16 July 2004 Telecommunications Law.

- 4. In other purposes, the Customer's Personal Data may be processed on the basis of:
  - a) applicable law when processing is necessary to fulfill the legal obligation of the Controller e.g. when based on tax regulations or accounting one, The Administrator settles concluded sales contracts (Article 6 (1) (c) of the GDPR);
  - b) indispensable for purposes other than those mentioned above resulting from legitimate interests pursued by the Controller or by a third party, in particular to determine, assert or defend claims, market and statistical analyses (Article 6 (1) (f) GDPR).
- 5. Personal data processed covered by the consent statement will be processed until the consent is revoked. Personal data processed for purposes related to the purchase will be processed for the period necessary to complete the purchase and order, after which the data subject to archiving will be stored for the period appropriate for the limitation of claims.

## IV. Recipients of personal data

- 1. Recipients of the Buyer's personal data may by entities performing the order at the Seller's request and handling it, such as: accounting companies, assembly services, providers of IT solutions, payment processing companies, banks, companies providing marketing services, telecommunication providers, law offices, authorised state authorities.
- 2. We do not allow third-party suppliers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## V. Your rights on personal data concerning you

1. As Customers provide their personal information voluntarily, they shall have the right to access their personal data and the right to rectify, delete, limit the processing, the right to data transfer, the right to object, the right to withdraw consent at any time .

- 2. If it is found that the processing of personal data violates the provisions of the GDPR, the data subject has the right to lodge a complaint with the President of the Office for Personal Data Protection.
- Detailed conditions of the above rights shall be indicated in Articles 1522 of the GDPR Regulation.

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The Controller reserves the right to make changes to the privacy policy.