

PRIVACY POLICY

I. INTRODUCTION

1. The controller of the personal data collected by means of the website available at axabee.com (hereinafter referred to as the Website) is AXABEE Sp. z o.o. with its registered office in Opole, ul. Reymonta 39, registered in the District Court in Opole, 8th Commercial Division of the National Court Register under KRS number 0000445964, NIP 7543069399, REGON 161505318 (hereinafter referred to as "Data Controller"). Contact with the Data Controller is possible via e-mail address: info@axabee.com.

The Controller is responsible for the security of the personal data transferred and for processing them in accordance with the law.

2. The Controller has appointed a Data Protection Officer (hereinafter: DPO), who can be contacted on matters related to the processing of personal data and the exercise of users' rights under data protection legislation: Paweł Makowski, e-mail: info@axabee.com.
3. Your personal data is processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: GDPR) and other currently applicable data protection laws.
4. During your visit to the Website, there is a collection of:
 - 1) personal data provided by the user of the Website;
 - 2) data received and recorded automatically.
5. The purpose and scope of the personal data used by the Data Controller is detailed further in the Privacy Policy.

II. DATA COLLECTED - BASIC INFORMATION

1. The following information applies to all uses of the personal data provided by you by the Data Controller as indicated in sections III and IV.
2. Your data will not be used to make decisions based solely on automated processing of personal data, including profiling within the meaning of Article 22 of the GDPR.
3. With all guarantees of data security, personal data processed through the Website may be transferred - in addition to persons authorised by the Data Controller- to other entities, including:
 - 1) entities entitled to receive them in accordance with legal regulations;
 - 2) entities processing them on behalf of the Controller, e.g. technical service providers, hosting service providers, analytics service providers, consulting service providers;

- 3) other data controllers to the extent necessary for the performance of the contract, services, and legal requirements, e.g. to notary or legal offices, contractors providing services to the Administrator on the basis of concluded contracts.
4. The Data Controller, to the extent necessary for the proper performance of the contract, may transfer your personal data to countries outside the European Economic Area (hereinafter: EEA), which guarantee a high level of personal data protection. These guarantees result in particular from the obligation to apply the standard contractual clauses adopted by the European Commission. The controller may also transfer data to countries outside the European Economic Area that do not guarantee an adequate level of protection. However, the Data Controller shall ensure that the transfer is carried out in a secure, controlled manner and is secured by means of appropriate agreements with their recipients which meet the conditions laid down in Chapter V of GDPR.
5. The Data Controller informs that in relation to the processing of personal data obtained through the Website, each data subject has the right to file a request to:
 - 1) access to data (information on the processing of personal data or a copy of the data);
 - 2) rectify data (if incorrect);
 - 3) erase personal data (right to be forgotten);
 - 4) restrict the processing of personal data;
 - 5) transfer the data to another controller;
 - 6) object to the processing of data, where the processing is based on the Data Controller's legitimate interests;
 - 7) withdraw consent where the Data Controller will process personal data on the basis of consent, at any time and in any way, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal- under the terms of the GDPR.
6. Every data subject has the right to lodge a complaint with a supervisory authority (the President of the Office for Personal Data Protection , <https://uodo.gov.pl/pl/83/155>) if he or she believes that the processing of personal data is being carried out in breach of the regulations.
7. The data was obtained by the Data Controller directly from the user of the Website. The Data Controller may also process:
 - 1) data of other persons provided by the user when using the services described in this privacy policy;
 - 2) personal data obtained from entities with which the Data Controller cooperates on the basis of contracts concluded (e.g. business details of employees designated for contact in order to perform the contract);

- 3) personal data obtained from third parties that cooperate with AXABEE Sp. z o.o. whereby the data were made available to the Data Controller on the basis of your consent;
- 4) data obtained from publicly available sources, e.g. the National Court Register, the Central Register and Information on Business Activity, websites, social networking sites.

III. PERSONAL DATA PROVIDED BY THE USER

III. A. E-MAIL OR TELEPHONE CONTACT

1. The Data Controller processes personal data, in particular the user's name, contact telephone number or e-mail address, as well as other information provided by the user, to the extent necessary to handle requests and queries, including communication and answering questions asked via the contact telephone number and e-mail address provided on the Website (legal basis - Article 6(1)(f) GDPR) - "legitimate interest".
2. The Data Controller is entitled to process personal data for the period necessary for the execution of the enquiry, including responding to the correspondence sent or the request/question provided during a telephone conversation.
3. The provision of data is voluntary, but necessary in order to answer the submitted question or for the proper handling and implementation of the enquiry. Failure to provide personal data may result in the impossibility of replying to or processing the enquiry.

III. B. FORMS (CONTACT, OFFER)

1. The Data Controller may collect personal data, in particular:
 - 1) name,
 - 2) surname,
 - 3) e-mail address,
 - 4) IP address,
 - 5) other information provided by the user through the available forms.
2. The Data Controller processes your personal data only to the extent necessary:
 - 1) to receive and handle your request, including carrying out communication and answering questions submitted via contact forms (legal basis - Article 6(1)(f) GDPR) - "legitimate interest";
 - 2) to establish contact and prepare and present an offer in response to the user's request transmitted via the forms available on the Website (legal basis - Article 6(1)(b) GDPR) - "to take action at the request of the data subject prior to entering into a contract".
3. The Data Controller is entitled to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
 - 1) the time required to reply to an enquiry sent by a user using the contact form;
 - 2) the time needed to prepare and communicate a dedicated offer.

4. Providing personal data specified in the forms is voluntary, but necessary to respond to the sent enquiry, properly handle the application, prepare, and present a dedicated offer. The consequence of failing to provide personal data may be impossibility of answering, completing the enquiry or presenting an offer.

III. C. MARKETING COMMUNICATION

1. The Data Controller processes your personal data in order to:
 - 1) carry out marketing communication by means of electronic communication (in particular electronic mail, telephone calls, SMS messages) on the basis of a separate consent to the processing of data for this purpose (legal basis - Article 6(1)(a) GDPR) - "consent";
 - 2) carry out direct marketing, including the sending of information about products and services of partners and other entities cooperating with the Data Controller, by means of electronic communication (in particular e-mail, telephone calls, SMS messages) (legal basis - Article 6(1)(f) GDPR) - "legitimate interest";

taking into account the provisions of the Telecommunications Law and the provisions of the Act on providing services by electronic means.

2. Providing data in order to receive marketing communication via the chosen communication channel (i.e. e-mail address, telephone number) is voluntary but necessary to receive information on the products and services of the Data Controller and its partners. The consequence of failing to provide personal data will be the impossibility of receiving marketing content.
3. The Data Controller is entitled to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
 - 1) the time until the objection is submitted,
 - 2) the time until the withdrawal of consent.
4. Consent may be withdrawn in particular by contacting the Data Controller or the DPO (via the contact details indicated above). The withdrawal of consent shall not affect the lawfulness of the use of data during the period in which such consent was in force.
5. The Data Controller may also make your personal data available to third parties (e.g. business partners) for the purpose of their own marketing activities. The disclosure of personal data will be possible only on the basis of your separate consent to the processing of data for such purposes. The entity indicated in the content of the consent shall then become an independent Data Controller of the personal data provided on this basis.

III. D. FACEBOOK

1. AXABEE Sp. z o.o. is the Data Controller of personal data of users using products and services offered by Facebook, who visit the Administrator's website, available at: <https://pl->

pl.facebook.com/axabeeecom (hereinafter: Fanpage). As the Data Controller, it is responsible for the security of the personal data provided and its processing in accordance with the legal regulations.

2. The Data Controller processes personal data of users who visit the Fanpage using Facebook products and services. This data is processed:
 - 1) in connection with the operation of the Fanpage, including the promotion of its own brand (legal basis - Article 6(1)(f) GDPR) - "legitimate interest";
 - 2) in order to respond to questions asked via Messenger or other services offered by Facebook (legal basis - Article 6(1)(f) GDPR) - "legitimate interest"; if the user provides special categories of data (e.g. health information), they declare that they consent to their use in order to properly handle the request and fulfil the enquiry, including communication and response (legal basis - Article 9(2)(a) GDPR) - "consent".
3. The Data Controller has the right to process:
 - 1) publicly available personal data (such as the user's username, profile picture, Facebook or Messenger activity status), the content of the user's comments, and other information publicly available by the user when using Facebook products and services,
 - 2) personal data that the user provides when they visit our Fanpage, including the collection of information provided in the user's profile and other content, comments, messages, and communications (e.g., photos, contact information, place of residence, information about the user's interests or beliefs, etc.),
 - 3) Other personal information the user provides in Messenger or other Facebook services (including contact information, health information, etc.) to respond to the user's enquiry or to fulfil the user's request for contact.
4. The scope of the processing of the user's personal data, the specific purposes, and the user's rights and obligations when using Facebook products and services are directly derived from:
 - 1) Facebook Terms and Conditions (document available on the Facebook website at: <https://www.facebook.com/legal/terms>) and
 - 2) "Data Policy" (the document is available on the Facebook website at: <https://www.facebook.com/policy>) or
 - 3) laws- and are further clarified as a result of the user's actions on the Facebook social network.
5. The Data Controller is entitled to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
 - 1) the time until the objection is submitted (or Facebook user account is deleted),

- 2) the time until the withdrawal of consent (or deletion of Facebook user account). The withdrawal of consent does not affect the lawfulness of data processing during the period in which consent was in force;
 - 3) the period of time needed to process your request via Messenger or other Facebook services.
6. The catalogue of recipients of personal data processed by the Data Controller originates primarily from the range of products and services used by the Facebook user, but also from the user's consent or from legal regulations. With all guarantees of data security, the Data Controller can provide personal data of user visiting Fanpage - apart from authorized by the Data Controller employees and associates of AXABEE Sp. z o.o. - to other entities processing data on behalf of the Data Controller e.g. technical service providers and entities providing advisory services (including law firms) and contractors providing services to the Data Controller on the basis of concluded agreements.
7. The Data Controller will not transfer the user's personal data using Facebook products and services to countries outside the European Economic Area (countries other than the European Union, Iceland, Norway and Liechtenstein).
8. The Data Controller may process the personal data of users of Facebook products and services who visit the Fanpage, in order to analyse how users use the Data Controller's website and related content (keeping statistics) - in the event that the use of the Fanpage and related content by users triggers the creation of an event for the statistics of the website, which involves the processing of personal data (legal basis - Article 6(1)(f) GDPR) - "legitimate interest".
9. In the case of personal data processed for the purpose of keeping statistics on actions taken by the user on the Fanpage (including watching or stopping watching the page, recommending the page in a post or comment, liking the page or post, cancelling a liking), AXABEE Sp. z o.o. and Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) are joint controllers of the users' personal data. The types of data and the scope of their processing, as well as the principles of privacy protection and the rights of users, are indicated in detail:
 - 1) in this document,
 - 2) in the "Data Policy" document, published on the Facebook page at: <https://www.facebook.com/policy>,
 - 3) in the document "Information about page statistics", published on the Facebook page at: https://www.facebook.com/legal/terms/page_controller_addendum.
10. It is Facebook's responsibility to notify users who use Facebook products and services of the processing of data for site statistics and to enable them to exercise their rights under the GDPR

(information about the data used to create site statistics has been made available on the Facebook page at:

https://www.facebook.com/legal/terms/information_about_page_insights_data).

11. The Facebook Data Protection Officer can be contacted via the form provided on the Facebook page at:

<https://www.facebook.com/help/contact/540977946302970>.

III. E. LINKEDIN

1. AXABEE Ltd. is the Data Controller of the personal data of users who use the products and services offered by LinkedIn who visit the Data Controller's website, available at: <https://pl.linkedin.com/company/axabee-sp--z-o-o-> (hereinafter: Company Page). As the Data Controller, it is responsible for the security of the personal data provided and its processing in accordance with the legal regulations.
2. The Data Controller processes personal data of users who, using LinkedIn products and services, visit the Company Page. This data is processed:
 - 1) in connection with the operation of the Company Website, including the promotion of its own brand (legal basis - Article 6(1)(f) GDPR) - "legitimate interest";
 - 2) for the purpose of answering enquiries made through the services offered by LinkedIn (legal basis - Article 6(1)(f) GDPR) - "legitimate interest"; if the user provides specific categories of data (e.g. health information), they declare that they consent to their use for the proper handling of your request and the processing of their enquiry, including communication and response (legal basis - Article 9(2)(a) GDPR) - "consent".
3. The Data Controller has the right to process:
 - 1) publicly available personal information (such as username, profile picture, activity status on LinkedIn), the content of comments and other information made publicly available by the user using LinkedIn products and services,
 - 2) personal information provided by a visitor to the Company Site, including the collection of information provided in the user profile and other content, comments, messages, and communications (e.g., photos, contact information, place of work, place of residence, information about education, interests, or beliefs),
 - 3) other personal data provided by the user in their LinkedIn message (including contact and health data) for the purpose of responding to the user's enquiry or request to be contacted.
4. The scope of the processing of personal data, the specific purposes and the rights and obligations of the user using LinkedIn's products and services arise directly from:

- 1) LinkedIn's rules and regulations (the document is available on the LinkedIn website at: <https://pl.linkedin.com/legal/user-agreement>) and
 - 2) "Privacy Policy" (the document is available on LinkedIn at: <https://pl.linkedin.com/legal/privacy-policy>) or
 - 3) laws
- and are further clarified as a result of the user's actions on the LinkedIn social network.
5. The Data Controller is entitled to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
 - 1) the time until the objection is submitted (or the deletion of LinkedIn user account),
 - 2) the time until the withdrawal of consent (or the deletion of LinkedIn user account). The withdrawal of consent does not affect the lawfulness of data processing during the period in which consent was in force;
 - 3) the period of time necessary to handle the request sent by the user through the LinkedIn services.
 6. The catalogue of recipients of the personal data processed by the Data Controller derives primarily from the range of products and services used by the LinkedIn user, but also from the user's consent or by law. With all guarantees of data security, the Data Controller can provide personal data of user visiting the Company Page - apart from authorized by the Data Controller employees and associates of AXABEE Sp. z o.o. - to other entities processing data on behalf of the Data Controller e.g. technical service providers and entities providing advisory services (including law firms) and contractors providing services to the Data Controller on the basis of concluded agreements.
 7. The Data Controller will not transfer the user's personal data using LinkedIn's products and services to countries outside the European Economic Area (countries other than the countries of the European Union and Iceland, Norway and Liechtenstein).
 8. The Data Controller may process personal data of users of LinkedIn products and services who visit the Company Page in order to analyse how users use the Administrator's website and related content (keeping statistics) - where users' use of the Company Page and related content triggers the creation of an event for the statistics of the website, with which the processing of personal data is associated (legal basis - Article 6(1)(f) GDPR) - "legitimate interest".
 9. In the case of personal data processed for the purpose of keeping statistics on the actions taken by the user on the Company Page (including watching or stopping watching the Company Page, recommending the Company Page in a post or comment), AXABEE Ltd. and LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland) are joint controllers of the users' personal

data. The types of data and the scope of their processing, as well as the principles of privacy protection and users' rights, are indicated in detail:

- 1) in this document,
 - 2) in the document "Privacy Policy", published on LinkedIn at: <https://pl.linkedin.com/legal/privacy-policy>,
 - 3) in the document "Page Insights Joint Controller Addendum", published on LinkedIn at: <https://legal.linkedin.com/pages-joint-controller-addendum>.
10. It is LinkedIn's responsibility to notify users who use LinkedIn's products and services of the processing of data for the purposes of site statistics and to enable them to enforce their rights under the GDPR (information about the data used to create site statistics has been made available on LinkedIn's website at: <https://pl.linkedin.com/legal/privacy-policy>).
11. The LinkedIn Data Protection Officer can be contacted via the form provided on the LinkedIn website at: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>.

IV. DATA COLLECTED AUTOMATICALLY

1. Using the Website involves sending requests to the server, which are automatically recorded in event logs.
2. The event logs record user session data. In particular, these are: IP address, device type and name, date and time of the visit, information about the web browser and operating system.
3. Data recorded in event logs are not associated with specific individuals.
4. Access to the content of event logs is available to persons authorized by the Data Controller to manage the Website.
5. A chronological record of events is only auxiliary material used for administrative purposes. The analysis of event logs makes it possible, in particular, to detect threats, ensure adequate security of the Website and to make statistics in order to better understand the way our Website is used by its users.
6. User session data is used to diagnose problems with the functioning of the Website and to analyse possible security breaches, to manage the Website, and to conduct anonymous statistics (legal basis - Article 6(1)(f) GDPR) - "legitimate interest".
7. The Website uses cookies and other tracking technologies for its operation. For more information, see the "Cookie Policy" available at <https://axabee.com/cookie-policy/>.

V. FINAL PROVISIONS

1. This privacy policy is for information purposes only and applies specifically to the Website available at axabee.com.
2. The Website contains links, plug-ins, tools or content that point to services, products and websites of partners, service providers and other entities cooperating (e.g. Google LLC,

Facebook Ireland Limited, LinkedIn Ireland Unlimited Company). The Data Controller recommends that each user, after navigating to other sites, reads the privacy policies applicable there.

3. The Data Controller reserves the right to introduce changes to the current privacy policy, in particular in the case of
 - 1) technological developments,
 - 2) changes in generally applicable laws, including those concerning personal data protection or information security,
 - 3) the development of the Website, including the implementation of new functionalities and services.
4. The Data Controller will notify users of changes to the content of the privacy policy by posting a notice on the Website .
5. This privacy policy applies from 01.12. 2021.