

## Privacy and Cookies Policy

Version: 1.0 | Effective from: 4 June 2025.

This privacy and cookies policy contains general information concerning the processing of personal data of persons visiting or using the services offered on the website by OPTOPOL Technology Sp. z o.o. It specifies how and to what extent user data are processed, for what purposes the data are used, to whom they are made available and how they are protected.

This policy fulfils the information obligation arising from Article 13(14) of 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 (General Data Protection Regulation) (GDPR).

### Legal basis

Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

The Act of 7 July 2023 - Electronic Communications Law

The Act of 18 July 2002 on the provision of services by electronic means (Polish: *ÚŚUDE*)

### Data Controller

The controller of your personal data is OPTOPOL Technology Sp. z o.o. with its registered office in Zawiercie, address: ul. Żabia 42, 42-400 Zawiercie, KRS (National Court Register number): 0000195272, NIP (taxpayer identification number): 649-19-87-762 (hereinafter referred to as the "Data Controller" or "OPTOPOL Technology Sp. z o.o."). Contact details of the Data Controller: [info@optopol.com.pl](mailto:info@optopol.com.pl), tel.: +48 32 67 07 400.

Contact in matters connected with personal data: [info@optopol.com.pl](mailto:info@optopol.com.pl).

### Data processing principles

The most important principles followed by us:

- data minimisation principle – we collect personal data only to the minimum extent necessary to achieve the purposes for which they are collected.
- we clearly define the purposes of collecting personal data based on provisions of law – we do not process data in a manner inconsistent with these purposes.
- we respect the user's right to access and correct his or her personal data.
- we adhere to the principle of limiting the retention of personal data in accordance with provisions of law, only for a period necessary to achieve the purposes for which they are collected.
- we make sure that the Users' data are up-to-date and correct and we promptly respond to any requests for correction or update of data.
- we protect the User's personal data against loss, unauthorised access, accidental loss or alteration and other unlawful forms of processing.
- we share data with other entities in accordance with the applicable provisions of law.
- we respect Users' rights to erasure of personal data, withdrawal of consent, restriction of processing, data portability, the right to object to data processing and the right not to be subject to decisions based solely on automated data processing, including profiling.

### Purposes and basis of data processing

Purpose of the processing	Legal basis	Retention period
Handling of inquiries submitted via a contact form or e-mail	Article 6 (1) (f) of the GDPR (legitimate interest)	Until limitation of claims, protection of the interests of the Data Controller
Handling of orders	Article 6 (1) (b), (c), (f) of the GDPR (contract)	For a period of 6 years (performance of the contract, for tax/accounting purposes or until limitation of claims)
Sending the newsletter (with consent)	Article 6 (1) (a) of the GDPR + Article 10 of the Act on the provision of services by electronic means	Until withdrawal of consent
Generation of statistics and traffic analysis	Article 6 (1) (f) of the GDPR	Anonymised without restrictions, other data up to 14 months
Session management, saving settings (technical cookies)	Article 6 (1) (f) of the GDPR	Until the end of the session
Handling of complaints and technical and service requests	Article 6 (1) (b) and (c), (f) of the GDPR	In accordance with provisions of law, in accordance with the warranty/guarantee, until cessation of claims

Issuing accounting documents	Article 6 (1) (c) of the GDPR	6 years.
Contact with B2B contractors	Article 6 (1) (f) of the GDPR	Until the end of cooperation
Personalisation of content and offers (media, articles)	Article 6 (1) (f) or (a) of the GDPR	Up to 14 months
Services associated with industry events	Article 6 (1) (b) and (f) of the GDPR	Up to 1 year after the event
Publication of details of cooperating specialists / practices	Article 6 (1) (a) or (f) of the GDPR	Until termination of cooperation or objection
Ensuring server security and log analysis	Article 6 (1) (f) of the GDPR	Up to 12 months

## **Our website obtains information about visitors and their behaviour in the following manner**

### **Information in the forms**

OPTOPOL Technology Sp. z o.o. collects information provided voluntarily by the website user, however, without providing such information it may not be possible to use the website functionalities required for handling an inquiry or request or creating an account.

OPTOPOL Technology Sp. z o.o. may automatically save information about the User's connection parameters (date and time of connection, IP address of the end device).

When using the contact form service, the User provides his or her personal data such as name, e-mail address, telephone number.

In the case of an order form without registering an account, the User provides his or her first name, surname, optionally the company name, shipping address (street, postal code, city/town), telephone number, e-mail address. In the case of the account registration form, the User provides his or her e-mail address, password, shipping address, first name, surname, username).

### **Information about cookies**

The website uses cookies.

Cookies are text files stored on the end device of the visitor which are intended to facilitate the use of the website. Cookies usually contain the name of the website from which they originate, the time they were saved on the end device and a unique number. The entity that places cookies on the visitor's end device and obtains access to them is the operator hosting the website of OPTOPOL Technology Sp. z o.o.

Cookies are used for the following purposes:

- to obtain static data concerning visitors,
- to maintain the visitor's session,
- to define the visitor profile,
- to store the visitor's preferred settings (e.g.: language settings).

The website uses two main types of cookies: "session cookies" and "persistent cookies". "Session" cookies are temporary files stored on the visitor's end device until the visitor logs out, leaves the website or closes the web-browser window. "Persistent" cookies are stored on the visitor's end device for the time specified in the parameters of the cookies or until they are deleted by the visitor. The software for browsing websites (web browser) usually allows cookies to be stored on the end device by default. Visitors can change their settings in this regard. The web browser allows cookies to be deleted. It is also possible to block cookies automatically. For details, please refer to the help or documentation of your web browser. Restrictions on the use of cookies may affect some of the functionalities available on the website. The User may refuse to accept the processing of cookies by rejecting the request for consent to their processing displayed on the website (this may cause the website to function incorrectly).

### **Cookie management**

If visitors do not wish to use cookies, they can change their browser settings. Please be advised that if you disable the cookies required for authentication and security processes and for storing your preferences, it can make the use of the website difficult or, in extreme cases, impossible. To assist you in managing your cookie settings, we have included examples of descriptions for the following web browsers on how to change your cookie settings. Please familiarise yourself with them and follow the instructions:

- Google Chrome
- Firefox
- Microsoft Edge
- Internet Explorer
- Safari
- Safari (iOS)
- Opera.

### **Server logs**

Information about some behaviours of the User may only be viewed after logging on the server hosting the website. These data are used for the purpose of administering the website, compiling statistics and efficient operation of the provided hosting services. The resources viewed are identified by URLs. In addition, the following may be recorded:

- time of arrival of the order or query to the website,
- the time of sending a response by the web server,
- the name of the client station – identification via the HTTP protocol,
- information about errors that occurred during the HTTP transaction,
- the URL address of the page previously visited by the Customer (referrer link) – in the case when the website was accessed via a link,
- information about the visitor's browser,
- information about the visitor's IP address.

The above data is not associated with specific persons browsing the websites – they are anonymous within the meaning of the law. The above data are used only for server administration purposes.

### **Data recipients**

Data may be processed by employees and associates of OPTOPOL Technology Sp. z o.o., as "persons responsible for processing", who, based on direct authorisation from the Data Controller or the Processor, have the right to process personal data in accordance with Articles 4.10 and 4.29 of the GDPR. Data may also be processed by trusted entities providing technical and organisational services to the Company based on concluded sub-processing agreements or other legal instruments permitted by EU law. The Data Controller may also make data available to other recipients solely at the request of entities authorised to do so by law or when it is necessary for achieving the demonstrated and legally justified purposes of the Data Controller or a third party.

### **Protection of personal data**

OPTOPOL Technology Sp. z o.o. cares about the security of the personal data of Customers, therefore wherever personal data are required, the connection between a Customer and the server is encrypted. As a result, Customers do not have to worry that the data sent to or from the server will be viewed, intercepted and used by anyone. Personal data have been provided knowingly and voluntarily and will only be processed for the purpose of responding to applications/queries submitted via the forms. Without express consent, personal data will not be shared with other data recipients, apart from subcontractors providing IT services to us for system maintenance purposes.

### **User rights**

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 (General Data Protection Regulation), OPTOPOL Technology Sp. z o.o. provides Customers with free access to personal data and respects their right to modify their data, the right to be forgotten, the right to rectification and the right to restriction of processing. Access, modification, rectification, erasure, restriction of processing.

The data subject may object to the processing of his or her personal data, at any time by, by sending a notification to the following address: [info@optopol.com.pl](mailto:info@optopol.com.pl). To obtain any information concerning access, modification, rectification or erasure of personal data, please contact us by e-mail at the address:

[info@optopol.com.pl](mailto:info@optopol.com.pl).

If you have any questions about the processing of your personal data, please contact us at the address:

[info@optopol.com.pl](mailto:info@optopol.com.pl).

### **Filing a complaint**

The User has the right to submit a complaint to the supervisory authority if he or she believes that his or her personal data are processed in violation of the GDPR. In the case of Poland, this is the President of the Office for Personal Data Protection.

### **Transfer of personal data to third countries**

The collected and processed data may be transferred outside the European Economic Area to third-party providers of IT services or data storage services. Data are transferred solely in accordance with data protection regulations and on condition that the data and the means of transfer are adequately secured, for example under a data transfer agreement based on contractual clauses adopted by the European Commission for the transfer of personal data from data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection regulations, or on the basis of Privacy Shield agreements for the transfer of personal data from entities in the EU to entities in the United States or an equivalent agreement in other jurisdictions, or data may be transferred to a country in which the European Commission has determined that the legally prescribed level of data protection in that country is adequate, or in the case when this is necessary for

concluding or performing a contract with a third party and, for purposes of such a contract, the transfer of data is in the interest of the data subject. In other cases, data may also be transferred with consent of the data subject.

**Duration of data processing**

All personal data are collected in accordance with the law, for the purposes indicated, on the need-to-know basis. Personal data will be stored in accordance with the principle of proportionality in a way that makes it possible to identify the data subject and until the purposes of the processing have been achieved.

**Social media plug-ins**

This website may contain plug-ins for some social media platforms. Social media plug-ins are special tools integrated into websites to provide direct access to features of social media platforms. Such plug-ins are marked with the respective logo of each social media platform. When you visit our website and use the plug-in, the information is transferred by your browser directly to the social media platform, which stores and processes it. For more detailed information on the purposes, types and methods of collecting, processing and storing personal data by social media and on how to exercise your rights, please refer to the privacy policy of the relevant social media platform.