

PRIVACY POLICY

www.cleverly.pl

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I. GENERAL PROVISIONS

1. The administrator of personal data collected through service www.cleverly.pl is:

Grzegorz Wilk CLEVERly

ul. Adama Bochenka 25C / 329, 30-693 Krakow

e-mail address (e mail): kontakt@cleverly.pl, hereinafter referred to as "Administrator".

2. Personal data is processed by the Administrator in a manner consistent with the scope of the granted by persons transferring permits and requirements of the current law, in accordance with EU Regulation no. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individual rights with regards to the processing of personal data and free data flow based on European Council 95/46 Directive (General Data Protection Regulation Act), hereinafter referred to as "RODO" or "RODO Regulation".

3. The Administrator does the best of its capabilities and knowledge to protect data and, in particular, ensures that all collected data is:

- a. processed in accordance with the European and local law,
- b. collected for marked, legitimate purposes and not further processed,
- c. correct and adequate in relation to the purposes for data storage, allowing persona identification in line with related data, which is necessary to achieve the purpose of processing.

II. THE PURPOSE AND SCOPE OF DATA COLLECTION

1. Users' personal data collected by the Administrator, are used for the purpose of contacting with the user and other related activities in the service www.cleverly.pl

2. The administrator processes the following personal data of users:

- a) First and last name,
- b) Phone number,
- c) Business e-mail address,
- d) Company name.

3. The Administrator may process the following data characterizing the way user navigates through the website and its services (operational data):

- a) markings identifying the endpoint device of the telecommunications network or system information technology used by the user,
 - b) information about the start, end and scope of each action taken by user at electronic services delivered by Administrator,
 - c) information about the range of electronic services used by user.
- 4) The administrator for statistics purposes collects information from the website using Google Analytics tool. These data are used only to analyze the traffic and behavior of users at www.cleverly.pl. These data may be made available to entities of the Government Administration at the explicit request to disclose them. These data are not processed by third parties, cooperating with the Administrator or sold to any entities.

III. THE BASIS OF DATA PROCESSING

1. Using the website and its electronic services through which involves the need to provide personal data, is completely voluntary.
2. According to RODO, data processing is permitted if:
 - a) the data subject gives his consent, unless data clearance demand is stated,
 - b) it is necessary for the contract execution or the subject is a party which consent is need to take action before contract execution
3. Data processing by Administrator is always based the basics acceptability of their processing mentioned in point II. Data processing will take place also in case of contract execution or the subject is a party which consent is need to take action before contract execution (par III, char. 2b).

IV. DATA CONTROL, VALIDATION, ACCESSIBILITY AND CORRECTION RIGHTS

1. The User has the right to access the personal data and to correct them.
2. Each person is entitled to control the data processing in Administrator's data set. Each User has the right to request completion, update, rectification, temporary or permanent suspension of data processing. Also in any case data is incomplete, out-of-date, untrue or have been collected in violation of the RODO Act or are no longer necessary to achieve the purpose for which they were collected. Data may be changed anytime without providing a reason.
3. In case of rights execution mentioned in the paragraph above (IV, char 1), the inquiry should be sent to: rodo@cleverly.pl.

V. COOKIES & POLICY

1. The Administrator's website uses "cookies". If the user does not change the browser settings, it agrees to use cookies.
2. Installation of "cookies" is necessary for the proper services delivery by the website. "Cookies" contain information necessary for correct website display and those that may require authorization.
3. The type of "cookie" files at Administrator's website are "Session cookies".
4. "Session" cookies are temporary files that are stored in the users' endpoint device unless leaving the service.
5. The user has the right to decide on the access of "cookies" to his computer by selecting them in the browser's window. Detailed information about "cookies" may be found at Internet browser's settings.

VI. FINAL PROVISIONS

- 1.The Administrator uses best available technology to ensure right protection of processed personal data, in regards to threat levels and categories of data protection. In particular, the Administrator secures data against an unauthorized access and/or take-over by an unauthorized persons, violation of internal policy or regulations, loss or damage.
- 2.The Administrator provides proper technology and means to prevent acquisitions or unauthorized modifications of personal data.
3. Any matters not covered by this Privacy Policy are subject to Polish law regulations.