

COOKIES POLICY

Cookies Policy:

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What are the legal basis for processing personal data?

The rules on the protection of personal data (hereinafter referred to as the GDPR¹) are set out, inter alia, in 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) (Text with EEA relevance) and the Act of 10 May 2018 on the Protection of Personal Data ² and country related special acts (lex specialis - Telecommunications Law).

Important terms

1. **"Personal data"** - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person,
2. **"Cookies"** - a cookie is a small text file that the website saves on the user's computer or mobile device when browsing the website,
3. **"Website"** - website provided at the link <https://cenega.pl/>, <https://cenega.com/> or other websites provided by the Controller,
4. **"Processing"** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction,
5. **"Controller"** - means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law,
6. **"Joint controller(s)"** – Joint controller(s) occurs when at least two Controllers jointly determine the purposes and means of processing, they are Joint controllers (art. 26 GDPR),
7. **"Third party"** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data,
8. **"Supervisory authority"** - means an independent public authority which is established by a Member State,

¹ GDPR: <https://uodo.gov.pl/en/514>

² The Act of 10 May 2018 on the Protection of Personal Data: <https://uodo.gov.pl/en/594>

9. **"Consent"** - the consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her,
10. **"Profiling"** - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements,
11. **"Cookies Policy"** - information on the use of cookies on the website run by the Controller. The cookie policy is available on the Controller's website. Cookies may belong to the Controller or to third parties,
12. **"GDPR"** - Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation): <https://uodo.gov.pl/pl/404>.

Who does this Cookie Policy apply to?

This Cookie Policy (hereinafter CP) concerns the processing of personal data of natural persons, website users, collected using cookies on the website or subpages belonging to the Controller.

Who is the Controller?

Please be advised that the Controller Cenega S.A. with headquarters in Warsaw, address: 36 Krakowiaków Street, 02-255 Warsaw, KRS 498248.

Contact details to the Controller

Please send inquiries regarding the protection of personal data to the Controller by traditional mail to the above-mentioned address or by e-mail to the address: iod@cenega.com

Data Protection Officer

Please be advised that the Controller has not appointed the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address: iod@cenega.com

Who is the supervisory authority?

We hereby inform that the supervisory authority is the President of the Office for Personal Data Protection (Office for Personal Data Protection), 2 Stawki Street, 00-193 Warsaw, contact to the supervisory authority is available at: <https://uodo.gov.pl/pl/p/kontakt>.

Information about Joint controllers

1. Please be advised that the Controller runs a fanpage (s) on Facebook (<https://www.facebook.com/CENEGA>) and others.
2. Please be advised that in connection with running a fanpage on FB, there is co-administration (Article 26 of the GDPR). The Joint controllers with regard to personal data processed on the fanpage are or may be:
 - 1) Cenega S.A.,
 - 2) Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland,
3. Please be advised that the Joint controllers made common arrangements. Information on co-administration and responsibilities is available at: <https://www.facebook.com/legal/controller>,
4. Please be advised that regardless of the arrangements made between the Joint controllers, the data subject may exercise his rights under the GDPR with respect to each of the data, Controllers separately,
5. Contact details to the Data Protection Officer:
 - 1) please be informed that the Controller Cenega S.A. did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address iod@cenega.com,
 - 2) contact details to the Data Protection Officer on behalf of Facebook Ireland Limited are available at: <https://www.facebook.com/privacy/explanation>.
6. We hereby inform that due to the co-administration, the supervisory authorities competent for the Controllers are:
 - 1) for Cenega S.A. - President of the Personal Data Protection Office (Personal Data Protection Office), 2 Stawki Street, 00-193 Warsaw, contact to the supervisory body is available at: <https://uodo.gov.pl/en/484>,
 - 2) for Facebook Ireland Limited - Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland: <https://www.dataprotection.ie/>.

What types of cookies are used?

The following types of cookies are or may be used on the website and subpages of the Controller's website:

- 1) technical, operational, optimizing navigation and display of content posted on the website,
- 2) analytical, profiling, tracking,
- 3) third party cookies,
- 4) cookies of other websites.

The use of analytical, profiling and tracking cookies

Please be advised that the Controller uses the analytical, profiling and tracking cookies described below on the website. Please be advised that in the case of the following cookies, the legal basis for the processing of personal data is Art. 6 (1) a) GDPR - consent of the data subject. Please be advised that consent is voluntary, and failure to do so will mean that cookies will not be used for the purposes for which they were provided. Withdrawal of the consent granted for analytical, profiling and tracking cookies is carried out by deleting them in the web browser:

No.	The name of the cookie	Description	Validity period
1.	_ga	Analytical cookie - is installed by Google Analytics for a period of 2 years. The cookie is used to calculate visitors, sessions, campaigns and website usage data to compile a website analytical report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors: https://policies.google.com/technologies/cookies?hl=pl	2 years
2.	_gid	Analytical cookie - this cookie is set by Google Analytics and is used for 1 day. The cookie is used to store information about how visitors use the website and helps in compiling an analytical report on how the website is performing. The collected data includes the number of visitors, the source they come from and the pages visited anonymously: https://policies.google.com/technologies/cookies?hl=pl	1 day
3.	_gat_UA-92303529-1	is used to distinguish user queries from bots	1 minute
4.	_gat_UA-79497025-1	used to distinguish user queries from bots (https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage)	1 minute

5.	_fbp	used to store and track visits to websites (https://www.facebook.com/policies/cookies)	3 months
6.	_hjid	used to store the user ID (https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookie-Information)	356 days
7.	_hjAbsoluteSessionInProgress	used to store unique visits (https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookie-Information)	30 minutes
8.	_hjIncludedInPageviewSample	used to store information on whether the user is subject to data sampling (https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookie-Information)	30 minutes
9.	test_cookie	used to check whether the browser supports cookies (https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookie-Information)	1 day

Operational, technical and optimization cookies

Please be advised that the Controller uses the operational, technical and optimization cookies described below on the website. Please be advised that in the case of the following cookies, the legal basis for the processing of personal data is Art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller. Please be noted that the actions described below are considered as the legitimate interest of the Controller:

No.	The name of the cookie	Description	Validity period
1.	frontendSession	used to maintain the user's session	25 days
2.	cookies-info	stores data whether the user has closed the window with information about cookies	30 days
3.	PHPSESSID	used to distinguish between user sessions	during the session
4.	cookieconsent_dismissed	remembering information about reading the cookie policy	1 year

Third party cookies

On some webpages or subpages belonging to the Controller, cookies from other parties may be used, and content from external entities, such as Facebook, YouTube, LinkedIn, Twitter, may also be displayed. To view third party content, you must first agree to their specific terms

and conditions. Part of these conditions is the cookie policy, over which the Controller has no control and is not responsible for the processing of personal data collected via cookies of these websites:

No.	Third party name	Link to information
1.	Facebook	https://www.facebook.com/legal/terms
2.	YouTube	https://www.youtube.com/t/terms
3.	LinkedIn	https://www.linkedin.com/legal/user-agreement
4.	Twitter	https://twitter.com/en/tos#intlTerms
5.	Google Maps	https://www.google.com/intl/en_be/help/terms_maps/

How to manage cookies?

Cookies can be managed freely and can be deleted. Individual browsers or devices may offer settings that allow you to choose whether browser cookies are to be set and also to delete them. These settings vary from browser to browser, and manufacturers can change both the settings they provide and the way they work at any time. Additional information on the settings offered by individual browsers can be found on the pages under the following links:

No.	Browser name	Link to information
1.	Google Chrome	https://support.google.com/chrome/answer/95647
2.	Internet Explorer	https://support.microsoft.com/en-ie/help/17442/windows-internet-explorer-delete-manage-cookies
3.	Firefox	https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US
4.	Safari	https://support.apple.com/en-ie/guide/safari/sfri11471/mac
5.	Opera	https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/

Transferring personal data to a third country (i.e. outside the EEA)

1. Please be informed that due to the use of cookies on the website, personal data processed via cookies may be transferred to a third country, i.e. outside the EEA. In the case of transfer of personal data outside the European Economic Area,
2. Please be advised that the transfer of personal data outside the EEA may involve the risk of not ensuring sufficient security of personal data,
3. List of entities that may transfer personal data outside the EEA, which may not ensure sufficient protection of personal data provided for in the GDPR:

No.	Name of the entity	Link to information	Possible negative consequences for the data subject
1.	Facebook	https://www.facebook.com/legal/terms	1) unauthorized access to data, 2) loss of control over your data,

			<p>3) no possibility of exercising the rights under the GDPR,</p> <p>4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,</p>
2.	YouTube	https://www.youtube.com/t/terms	<p>1) unauthorized access to data,</p> <p>2) loss of control over your data,</p> <p>3) no possibility of exercising the rights under the GDPR,</p> <p>4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,</p>
3.	Google	https://policies.google.com/terms?hl=en&gl=be	<p>1) unauthorized access to data,</p> <p>2) loss of control over your data,</p> <p>3) no possibility of exercising the rights under the GDPR,</p> <p>4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,</p>
4.	LinkedIn	https://www.linkedin.com/legal/user-agreement	<p>1) unauthorized access to data,</p> <p>2) loss of control over your data,</p> <p>3) no possibility of exercising the rights under the GDPR,</p> <p>4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,</p>
5.	Twitter	https://twitter.com/en/tos#intlTerms	<p>1) unauthorized access to data,</p> <p>2) loss of control over your data,</p> <p>3) no possibility of exercising the rights under the GDPR,</p> <p>4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,</p>
6.	Google Maps	https://www.google.com/intl/en_be/help/terms_maps/	<p>1) unauthorized access to data,</p> <p>2) loss of control over your data,</p> <p>3) no possibility of exercising the rights under the GDPR,</p> <p>4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,</p>

Disclosure of personal data

Please be advised that personal data is disclosed to data recipients. The categories of recipients are entities that provide marketing services, advertising agencies, marketing agencies with which the Controller has concluded Data Processing Agreement based on art. 28 GDPR. The list of entities to which personal data is entrusted is available at the request of the data subject.

Implementation of the rights of data subjects

We would like to inform you about the right to request the Controller to exercise the following rights:

- 1) the right to access personal data relating to the data subject,
- 2) the right to rectify personal data,
- 3) the right to delete personal data (erasure of personal data),
- 4) the right to limit the processing of personal data (restriction of processing),
- 5) the right to object to the processing,
- 6) the right to transfer data (the right to data portability),
- 7) the right to receive a copy of your personal data,
- 8) the right to lodge a complaint with the supervisory body (<https://uodo.gov.pl/pl/83/155>).

Please be advised that due to the individual purposes of processing listed in this Cookie Policy, the exercise of the rights of data subjects may be fully or partially limited, e.g. due to applicable law, which obliges the Controller to process them. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address: iod@cenega.com

Data Protection Impact Assessment (i.e. DPIA)

1. If a given type of processing - in particular with the use of new technologies - due to its nature, scope, context and purposes, is likely to result in a high risk of violating the rights or freedoms of natural persons, the Controller, prior to processing, shall assess the effects of the planned processing operations for the protection of personal data,
2. Please be informed that that due to the use of analytical, profiling and cookies on the website, personal data processed through the above-mentioned cookies may be transferred to a third country, i.e. outside the EEA. In the event of transfer of personal data outside the European Economic Area, a given country may not provide sufficient protection of personal data, may not ensure the implementation of rights under the GDPR, personal data protection may be violated. Please be advised that the transfer of personal data outside the EEA may involve a high risk of not ensuring sufficient security for the personal data being processed,
3. List of entities that may transfer personal data outside the EEA, which may not ensure sufficient protection of personal data provided for in the GDPR:

No.	Name of the entity	Link to information	Possible negative consequences for the data subject - the risk related to the transfer of personal data outside the EEA
1.	Facebook	https://www.facebook.com/legal/terms	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR,

			4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects
2.	YouTube	https://www.youtube.com/t/terms	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects
3.	Google	https://policies.google.com/terms?hl=en&gl=be	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects
4.	LinkedIn	https://www.linkedin.com/legal/user-agreement	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects
5.	Twitter	https://twitter.com/en/tos#intlTerms	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects
6.	Google Maps	https://www.google.com/intl/en_be/help/terms_maps/	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects