

## M3M Privacy Policy

### § 1 DEFINITIONS

1. **Personal Data Controller (PDC)** – M3Mcom Sp. z o.o., ul. Wolska 88, 01-141 Warsaw.
2. **Personal data** – information about an identified or identifiable individual (an identifiable individual is a person which can be directly or indirectly identified), including but not limited to an identifier such as their name and surname, identification number, location data, Internet ID or one or several specific parameters defining the individual's physical, physiological, genetic, psychological, economic, cultural or social identity.
3. **GDPR** – 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.
4. **Data subject** – an individual whose personal data are processed by the Controller, e.g. a person making an inquiry by means of an online contact form.
5. **Policy** – this Privacy Policy.

### § 2

#### DATA PROCESSING PRINCIPLES

1. In the course of its economic activity, the Controller collects and processes personal data in accordance with applicable law and the provisions concerning the protection of personal data set forth in the GDPR.
2. When processing data, the Controller adheres to the following principles:
  - principle of legality, reliability, transparency;
  - principle of purpose and data processing limitation;
  - principle of data minimisation;
  - principle of correct data processing;
  - storage limitation principle;
  - principle of integrity and confidentiality of processing;
  - principle of accountability.
3. The Controller agrees to protect your personal data in accordance with applicable regulations; in particular, the Controller agrees not to disclose your personal data to third parties and to process your personal data only for specific purposes.

4. Personal data are safeguarded against unlawful third-party access, appropriation by unauthorised persons, destruction, loss, damage or alteration and any kind of processing which is non-compliant with generally applicable law. The Controller uses relevant security measures to protect personal data. Data storage procedures have been put in place, along with internal rules for auditing collected data, and data retention periods have been defined.

### **§ 3**

#### **PERSONAL DATA SECURITY**

1. The Controller has implemented procedures ensuring data integrity and confidentiality. Personal data can only be accessed by persons authorized by the Controller and only as necessary for the performance of their relevant task and obligations.
2. All operations performed by the Controller on the data are recorded and carried out by authorized persons, with technical and organisational measures implemented in the procedures applied.
3. The Controller makes sure to cooperate only with those entities who fully guarantee a high level of personal data processing security.
4. The Controller monitors the adequacy of the safeguards applied and identifies any potential threats on an ongoing basis.
5. Persons who process personal data have been obliged by the Controller to keep such personal data secret as well as to maintain confidentiality.

### **§ 4**

#### **COOKIE POLICY AND TECHNICAL REQUIREMENTS**

1. When you use the website at [www.m3mcom.pl](http://www.m3mcom.pl), we collect cookie files ("cookies"), i.e. text files which may contain personal data such as the IP address of your computer and your unique device identifier, stored in a file.
2. The legal basis for collecting data stored in cookie files is Article 6(1)(f) of the GDPR, which permits the processing of personal data for the purposes of the legitimate interests pursued by the Controller. In this case, the purpose is to customize the website to the user's individual settings and store the data input by the user in connection with the use of the website, as well as to carry out statistical analyses concerning users and visitors, for the Controller's purposes.
3. You can disable cookies by selecting relevant settings in the browser which you are using. Please note, however, that this may hinder the use of all functionalities offered by the website.

4. You can access your data in the form in which they are collected to be used by the website by analysing the content of cookie files stored on your computer's drive and delete them at any time.
5. You have the right to remove your data, raise an objection to the processing of your data, as well as to lodge a complaint with a supervisory authority.
6. The table below lists information on cookie files used in the m3mcom.pl domain.

Cookie	Description	Duration
_gcl_au	This cookie is used by Google Analytics to understand user interaction with the website.	Analytics
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	Analytics
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.	Analytics
_gat_UA-175564835-1	This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it	Performance

	relates to. It appears to be a variation of the _gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites.	
test_cookie	This cookie is set by doubleclick.net. The purpose of the cookie is to determine if the users' browser supports cookies.	Advertisement

## § 5

### RIGHTS OF DATA SUBJECTS

1. **The right to obtain information on the processing of personal data:** the Controller informs the person making the request about relevant processing, i.e. purposes and legal grounds for the processing of data, the scope of data in the Controller's possession, entities to which the data have been made available and planned data retention time.
2. **The right to rectify:** the Controller must remove any errors or typos and supplement any incomplete data.
3. **The right to remove data:** the data subject may request that their data be erased if the processing of such data is no longer necessary for the purpose for which they were collected.
4. **The right to obtain a copy of data:** the Controller must provide the person making the request with a copy of the person's data being processed.
5. **The right to portability:** on the data subject's request, the Controller must make the data subject's data available in a format readable on a computer or transfer them to another entity named by the data subject.
6. **The right to restriction of processing:** in the event of the data subject's request to restrict the processing of data, the Controller must cease to perform any operations on the data and store them in accordance with relevant data retention periods.
7. **The right to object to the processing of data for marketing purposes:** the data subject has the right to raise such objection, which effectively prevents the Controller from processing these data for marketing purposes.
8. **The right to withdrawal of consent:** the data subject has the right to withdraw his or her previous consent to data processing.
9. **The right to lodge a complaint:** the data subject has the right to lodge a complaint with a data protection authority if at any time he or she believes that the Controller is in breach of personal data protection regulations.

## § 6

### MAIL AND E-MAIL CORRESPONDENCE

1. All correspondence sent to the Controller on matters other than the services provided by M3M containing personal data will be processed exclusively for communication purposes and to respond to the issues referred to in such correspondence.
2. The legal basis for the processing of personal data in order to reply to a request for contact, as well as all correspondence maintained by the Controller in connection with the Controller's economic activity, are defined in Article 6(1)(f) of the GDPR.
3. The Controller engages in all forms of telephone contact on data subject's request for legally justified purposes, which provides legal basis for the processing of personal data obtained during a telephone conversation, Article 6(1)(f) of the GDPR.
4. The Controller only provides trade information by means of electronic communication once relevant consent has been obtained. Such consent may be withdrawn at any time.

## § 7

### HANDLING REQUESTS CONCERNING DATA PROTECTION RIGHTS

1. Requests to exercise the rights of data subjects can be submitted:
  - in writing to: M3Mcom Sp. z o.o., ul. Wolska 88, 01-416 Warszawa,
  - in an e-mail to: [biuro@m3mcom.pl](mailto:biuro@m3mcom.pl).
2. The Controller will reply to your submission within 30 days of its receipt.
3. The reply will be sent only to the mailing or e-mail address provided in the request.