

# Privacy Policy and Cookies

## General information

This Privacy and cookies Policy specifies the rules for the processing and protection of personal data, as well as the use of 'cookies' and other technology described in this document in connection with the use of the Website by the User.

1. The Administrator of personal data is KLUB DIALOGU civil partnership Wioletta Kunicka-Kajczuk, Piotr Kajczuk with its registered office at Al. Jerozolimskie 55/4, 00-697 Warsaw, registered in the CEiDG register in Warsaw, NIP: 526-276-44-16, REGON: 015728684 (referred to as the 'Administrator' or KLUB DIALOGU) .
2. KLUB DIALOGU s.c., as the Administrator, manages access to the Website [www.klubdialogu.pl](http://www.klubdialogu.pl) (referred to as the 'Website') and contents on the Website.
3. User - any person that interacts with the content of the Website.
4. RODO - Regulation (EU) 2016/679 of the European Parliament and of the Council from 27th 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/WE.

## Basic policies regarding personal data

1. The Administrator processes the personal data of the User who visited the Website or who contacted KLUB DIALOGU either by using the contact forms available on the Website, by e-mail, by phone, or by text message.
2. The legal basis for the processing of Users' personal data is voluntary and is consciously and clearly consented for by the User.
3. The Administrator guarantees the confidentiality of all personal data that is provided to the highest extent.
4. The purpose of personal data processing is to contact the User, in order to send the targeted information in the following areas:
  - ✓ Polish language courses and other trainings that may develop the User's knowledge,
  - ✓ The organization of competitions and promotional campaigns in which the User may participate,
  - ✓ Events organised or recommended by KLUB DIALOGU.
5. The purpose of data processing is also for:
  - ✓ Booking a place at the language courses,
  - ✓ Concluding a schooling contract,
  - ✓ Providing the necessary materials and access,
  - ✓ Issuing certificates or diplomas,

- ✓ Enabling contact with other participants of the schooling after its completion,
- ✓ Examining the quality of language courses after its completion through a questionnaire,
- ✓ Enabling the implementation of exams at our examination center,
- ✓ Debt collection, conducting court, arbitration and mediation proceedings,
- ✓ Improving the efficiency and quality of services,
- ✓ Analytical, statistical and marketing purposes,
- ✓ The proper functioning, configuration and security of the Website,
- ✓ Monitoring the state of the session,
- ✓ Displaying personalized advertisements.

6. In order to perform the services provided by KLUB DIALOGU, it is necessary to provide the following personal data:

- ✓ For registration for a course or an additional event as well as concluding a schooling contract: name and surname, gender, e-mail address, telephone number and level of Polish language skills. Providing other data is voluntary,
- ✓ For issuing an invoice: name and surname, employer's data or other data required through the Client,
- ✓ For implementation of the "One Year Program": name and surname, gender, nationality, date and place of birth, passport number and expiration date and the purpose of the stay in Poland.

7. The Administrator informs, that every User who has provided his/her personal data has the right to access the data, to request the supplementation, amendment, rectification of personal data, temporary or permanent suspension of the processing of the data or its removal.

8. In order to implement their rights, the User should send a request to: [info@klubdialogu.pl](mailto:info@klubdialogu.pl)

9. Personal data stored for the purpose of sending commercial information and direct marketing will be stored and processed until you withdraw your consent to it. Immediately after such objection, we will stop processing the data in this area.

10. The Administrator does not transfer personal data to third parties. The Administrator informs, however, that they are commissioning technical support for the Website to third parties and uses the LangLion data base, Zoom, Google, FreshMail services.

#### **The data processing policies through Automatic Data Collection Technologies**

1. The personal data of the User visiting the Website is automatically processed by Google Analytics. These are data resulting from the general rules of connections made on the Internet, such as: IP address, location, browser type, type of operating system, type of device and method of communication with the Administrator. This information is used for technical purposes related to the administration of the Website and to collect general statistical demographic information in order to better match the offer.

2. The Website uses standard "cookies" to provide services and content tailored to individual needs and interests. This means that the Website collects data such as: date and time of visiting the Website and visited sites just before and just after. Disabling "cookies" in the browser usually does not prevent the use of our services, but may cause difficulties. The Administrator does not sell or provide "cookies" to external parties.

3. Browsing the Website without making contact is not associated with the provision of personal data.

4. Using the Website requires sending queries to the server on which the Website is stored. Each such query is saved in the server logs. The logs include, among other things: User's IP address, date and time of logging into the server, information about the web browser used and the operating system.

5. The data stored in the server logs are not connected in any way to specific entities using the Website and are not used by the Administrator to identify the User. Server logs are used to administer the Website, and their content is not disclosed to anyone except those authorized to administer the server.

6. The Administrator reserves the right to use the equivalent of "cookie" files, such as social networking site pixels. Pixels enable social networking websites to track users on external websites to customize the advertising messages displayed to users visiting this social website. The Company reserves the right to use these pixels in accordance with the policy of various social networking sites.

#### **Links referring to other websites**

The KLUB DIALOGU Website contains links to third parties. Third parties may use their "cookie". The Administrator is not responsible for the Privacy Policy applied by the owners or administrators of the sites to which these links direct.

We encourage you to read the contents of the privacy statements posted on the websites that collect personal data.

#### **Data sent from outside the borders of Poland**

KLUB DIALOGU conducts its activities in Poland and is subject to Polish law, also in the area of Privacy Policy. If the information sent containing personal data comes from places subject to other laws, the User, by submitting his/her personal data, consents to its processing in accordance with the applicable Polish law.

#### **E-mail policy**

1. The Privacy Policy of KLUB DIALOGU includes a commitment to confidentiality of the content and e-mail addresses provided to us. Because of this, KLUB DIALOGU does not disclose, sell or rent its database to third parties. The exceptions are the cases described in the 'Information Disclosure' section.

2. E-mails sent to people registered in the KLUB DIALOGU database clearly include within them who sent them. By replying back to the e-mail, you can make a request to unsubscribe from the database.

### **Information Disclosure policies**

1. The Administrator may disclose personal data to third parties that provide IT and marketing services to KLUB DIALOGU.

2. The Administrator may disclose information to a law firm or a collection agency if it is necessary to enforce the terms of service provision, or resulting from any other contract between a person and KLUB DIALOGU.

3. The Administrator may disclose information to judicial or prosecution bodies or other state bodies under their binding decisions or rulings.

### **Other information**

1. The security of the data provided to KLUB DIALOGU is a priority for us. Therefore, the Administrator applies generally applied measures to prevent unauthorized access, modification, usage or deletion of these data from the database. However, each person transferring their data to KLUB DIALOGU must be aware that there isn't 100% security, which is why the Administrator does not guarantee absolute security.

2. E-mail is not a secure medium for data transmission, although it is often the only possible one. However, it should be remembered that sensitive data, e.g. containing information about credit card details, should never be given out via e-mail.

3. KLUB DIALOGU may use computer programs for security reasons, to identify threats or unauthorized access.

4. In the event of any changes in relation to this Privacy Policy, these changes will immediately be made available on the KLUB DIALOGU Website.

5. Any questions or remarks regarding the Privacy Policy and cookies should be sent to: [info@klubdialogu.pl](mailto:info@klubdialogu.pl)