

# PRIVACY POLICY AND USE OF COOKIES FILES

This privacy policy and use of cookies is a set of rules for processing of personal data and the collection of cookies by CADM Automotive sp. z o.o., in particular on websites [www.cadm-a.com](http://www.cadm-a.com) (hereinafter referred to as the "Service").

This Privacy Policy is addressed to all those who visit:

- website [www.cadm-a.com](http://www.cadm-a.com),
- Facebook fanpage <https://www.facebook.com/CADM.Automotive/>,
- Instagram profile <https://www.instagram.com/cadmautomotive/>
- LinkedIn account <https://www.linkedin.com/company/cadm-automotive/>

(hereinafter referred to as the „**Social Network Profiles**”), contact the administrator of personal data (in particular by phone, e-mail), are employees, collaborators or representatives of contractors of Administrator of Personal Data (hereinafter referred to as "**Users**").

Before using the Website, Social Network Profiles and the services of administrator of personal data, the User should read the Privacy Policy and Use of Cookies Files. The aim of the said document is, among others, implementation of the information obligation referred to in Article 13 section 1 and 2 and Article 14 section 1 and 2 of the Regulation of the European Parliament and of the Council (EU) 2016/679 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 the repeal of Directive 95/46 / EC (General Regulation on the Protection of data), hereinafter referred to as the "**RODO**".

## PRIVACY POLICY

### The administrator of personal data

The Administrator of Users' personal data is CADM Automotive spółka z ograniczoną odpowiedzialnością (Polish limited liability company) seated in Kraków (KRS: 0000420015) ul. Samuela Lindego 1C, 30-148 Kraków (the "Administrator"). Users may contact the Administrator, by the following means:

- by mail to the following address: ul. Samuela Lindego 1C, 30-148 Kraków
- by e-mail: [info@cadm-a.com](mailto:info@cadm-a.com)
- by phone: +48 12 397 21 82

### The data protection officer

The Administrator designated the data protection officer (hereinafter referred to as the „**IOD**”) – Ms Renata Ciupka - the person who can be contacted in any matter connected with processing personal data and use of rights associated with processing data. Users may contact the IOD, by following means:

- by mail to the following address: ul. Samuela Lindego 1C, 30-148 Kraków
- by e-mail: [iod@cadm-a.com](mailto:iod@cadm-a.com).

## **Objectives of processing of personal data and the legal basis for processing**

Users' personal data shall be processed for the following purposes and under the following legal basis:

1. responding to inquiries from Users and contacting Users regarding matters they addressed the Administrator on, in particular by sending him an e-mail or by chat on the Social Media Profiles. The legal basis for data processing is legally justified interest of the Administrator (pursuant to the Article 6 section 1 letter f of RODO), consisting in the necessity to reply to the Users;
2. controlling and analyzing the movement on the Service and Social Media Profiles as well as conducting marketing activities on the grounds of the legally justified interest of the Administrator pursuant to the Article 6 section 1 letter f of RODO), consisting in promoting the services of Administrator;
3. contacting Users in current affairs, in particular regarding agreements between the Administrator and the User, the User's employer or entity that the User represents, submitting bids, receiving requests and orders, answering questions. The legal basis for data processing is legally justified interest of the Administrator (pursuant to the Article 6 section 1 letter f of RODO), consisting in necessity of constantly contacting the contractors of the Administrator;
4. implementation of the agreements concluded between the Administrator and the User, the User's employer or entity that the User represent, including receiving and performing orders, submitting of orders, concluding contracts, carrying out activities in the field of accounting, accounting services, debt collection. The legal basis thereof is the necessity to perform the contract or take action prior to entering into a contract with the User (pursuant to the Article 6 section 1 letter b of RODO), as well as the legally justified interests of the Administrator (pursuant to the Article 6 section 1 letter f of RODO), consisting in necessity of the correct implementation of agreements with contractors;
5. fulfillment of legal obligations imposed on the Administrator, in particular under the provisions of tax law (pursuant to the Article 6 section 1 letter c of RODO);
6. determining, securing and the pursuing possible claims of both the Administrator and the User. The legal basis is a legally justified interest of the Administrator (pursuant to the Article 6 section 1 letter f of RODO) consisting of the possibility of determining, pursuing or defending claims.

## **Categories of references to the data**

The Administrator processes personal data of the Users necessary to implementation of the objectives mentioned hereinabove, in particular identification data, contact details and information on the employer.

## **The recipients of data (categories of recipients)**

The Users' personal data may be shared with external entities providing services to the Administrator, such as accounting services as well as IT services providers, including e-mail and providing services to the contractors. The Administrator may share the personal data with

entities based in the non-EU third countries only if the adequate level of protection in the said country has been established. The Administrator shares the data of the Users with:

1. Facebook Inc. Headquartered in California, USA and Facebook Ireland Ltd. – these entities are liable for plug-in of Facebook social network and Facebook fanpage activity as well as functionality „chatbot” based both on platforms Messenger and Facebook Chat. The hereinabove mentioned entities process the Users’ personal data if their Facebook account is active. They allow to „like” the Administrator’s fanpage on Facebook social network, read the content published, viewing photos, writing comments or „liking” posts. The company Facebook Inc. is participating in the Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active> . The rules of processing the data shared by users of Facebook Messenger are included in privacy policy of Facebook available at <https://www.facebook.com/policy.php#>.
2. Google LLC Headquartered in California, USA and Google Ireland Ltd - these entities are liable for analyzing the website traffic within this website. The company Google LLC is participating in the Privacy Shield, proper information is available here: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>

Companies Facebook Ireland Ltd. and Google Ireland Ltd are the subjects of Irish law therefore it applies the EU rules in processing personal data.

## **The period of storage of personal data**

We will store the Users’ data for the period necessary to achieve the objectives set out hereinabove. If:

- the User's personal data are processed in connection with the contract concluded with the User, his employer or entity, which the User represents will be stored for a period of performance of the contract and to the necessary extent - for 5 years from the end of the calendar year in which the payment of the tax became past due in connection with the conclusion and implementation of the agreement or longer if required by law,
- the User contacted the administrator - the data will be processed for the time necessary for the purpose of contacting the User and for a period of 2 years from the termination of the contact,
- the User’s personal data are processed in connection with using the Social Media Profiles – for the period of having an account on the said Social Media.

If the User’s personal data will no longer be necessary for the purposes for which they were processed, the Administrator will keep them in order to determine, pursue or defend potential claims of both the Administrator and the User only for periods of limitation set out in the provisions of law.

## **The consequences of failure to provide personal data**

Except in cases in which providing personal data is legally required, the provision of personal data is entirely voluntary, but the failure to provide them may impede or prevent us from achieving objectives set out hereinabove.

## **Information on automated decision-making**

The Users' data will not be processed in an automated way, also it will not be processed in the form of profiling by the Administrator.

## **The source of personal data**

The User's personal data, which are not collected directly from the Users, may be obtained from their employers, collaborators or entities that the User represents. The Administrator may also process personal data derived from the sources accessible to the public.

## **Rights relating to the processing of personal data**

The User is entitled to the following rights related to the processing of personal data:

1. the right of access to personal data, the right to request rectification, erasure or restriction of processing of personal data, as long as these rights are not excluded or restricted by the provisions of law.
2. The right to object to the processing of personal data because of the special situation of the User - in cases where your personal data is processed on the basis of legally justified interests of the Administrator.
3. The right to transfer the personal data, i.e. the right to receive personal data in a structured, commonly used machine-readable format. The User may send the data to another administrator of personal data or demand that send the data to another administrator. However, we will do so only if such transfer is technically possible.
4. The right to lodge a complaint to the authority - the President of the Personal Data Protection Office.
5. Other rights arising from generally applicable provisions of law.

In order to use these rights, please contact the Administrator.

# **COOKIES**

## **What are cookies?**

Cookies are online data, in particular text files that are stored in the User's terminal device (computer, mobile phone, tablet). Primarily, they contain the name of the website of its origin, their unique number, time of storage on the terminal device. Through the cookies the statistical information about Users' traffic, visitor activity and the way of using of the Service are delivered to the Administrator. They allow to customize the content and services to the preferences of the User.

## **What are cookies used for?**

In connection with the use of cookies, we pass the most important information about their use.

1. The cookie mechanism is not used to obtain any information about the Users, except for their behaviour on the Site.
2. The Administrator stores the cookies on the Users' computers in order to:

- a. properly adjust the Service to the Users' needs and optimize the use of the websites;
  - b. remember the preferences and personal user settings, recognising the device and ensuring the proper viewing of a website tailored to their needs (full and mobile version of the page);
  - c. create the viewing statistics of the Service that helps to understand how the Users use the websites, which allows to improve their structure and content;
  - d. maintain the User's sessions (after logging in), so the User does not have to re-enter login and password on every page of the Service.
3. Due to the Facebook, Instagram and LinkedIn plug-ins being placed in the Service, the cookies may also facilitate the Social Media to record the presence of the User on the Service website and to adjust the displayed commercials to the activity of the User.

## What are the types of cookies?

In the Service there are used the two basic types of cookies:

- a "session" ones ( "session cookies") and
- "permanent" ones ( "persistent cookies").

The session cookies are temporary files that are stored in the User's terminal device until logging out time, leaving the website or disabling the software (web browser). The permanent cookies are stored in the User's terminal device for the time specified in the cookie files parameters or until removal thereof by the User.

In the Service, the following types of cookies are being used:

- the "essential" cookies, enabling the use of the services available through the Service, e.g. authentication cookie files used for services that require authentication through the Service;
- the cookies used to ensure safety, e.g. used to detect misuses in the field of authentication through the Service;
- the "performance" cookies, enabling the collection of information about the manner of using the websites of the Service;
- the "functional" cookies, enable to "remember" the settings chosen by the User and personalize the User's interface, e.g. in terms of the chosen language or region the User comes from, the font size, the design of the website, etc.

## How to block the cookies?

In many cases, web browsers allow to store cookies in the User's terminal device by default. Service Users may change the settings for cookies at any time, for example in order to block the automatic enabling of cookies or to inform the User about them being enabled into the Service User's device. Detailed information about the possibilities and ways of enabling cookies are available in the browser settings or at the following websites:

- [Microsoft Edge](#) browser
- [Mozilla Firefox](#) browser
- [Chrome](#) browser
- [Safari](#) browser

- [Opera](#) browser

Futhermore, the User may block sharing their activity in the Service with Google Analytics, using methods available here: <https://tools.google.com/dlpage/gaoptout> .

The Administrator hereby informs that the limitations of using cookie files may affect some functions available on the Service websites.