# Privacy Policy



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#### I. General

- The website available at <a href="www.malkowski.pl">www.malkowski.pl</a> is operated by Małkowski-Martech S.A. with its registered office in Czołowo, ul. Leśna 57, 62-035 Kórnik, entered in the register of entrepreneurs kept by the District Court in Poznań, 9th Commercial Division of the National Court Register under KRS number: 0000350585; NIP (Tax Identification Number): 1230029611; REGON (National Business Registry Number): 006372010 (hereinafter referred to as "Małkowski-Martech").
- 2. The Website obtains information about its users and their activities in the following ways:
  - a) by storing information voluntarily provided by website users in the forms made available on the website,
  - b) by using cookies stored on terminal equipment,
  - c) through profiling.

#### II. Information obtained in forms

- 1. The website collects information voluntarily provided by the user.
- 2. Apart from the information referred to in section 1, the website records information about connection parameters: connection time marking, user's IP address.
- 3. The scope of data collected in forms and the purpose of their processing depend on the function of a particular form (e.g. newsletter subscription form, contact forms, registration form for creating an account, product enquiry forms, etc.).

#### III. About cookies

- 1. The website uses cookies.
- 2. A cookie is a small text file saved by www.malkowski.pl on your device when you view content on the website. When using the website without changing your browser

- settings, you give consent to our use of cookies to ensure the convenience and security of your visit to the website.
- 3. Most websites use cookies. Your web browser creates these files each time you visit our website. Some of them may remain in your device after you close your browser. When you visit the website in the future using the same device, your browser will verify whether the relevant cookie (containing the name of our website) is stored in your device and will send the data back to the website. This makes it possible to know that you used our website in the past and, in some cases, to adapt the content presented on the website to their preferences. In this way, cookies make it easier for you to use any websites you have visited before. If you are using the same device and browser that you used in the past, cookies make it possible to save your individual preferences.
- 4. You may change the cookies settings through the browser you use to browse our website (also to block or delete cookies originating from specific websites) at any time. Most browsers allow you to accept or reject all cookies, to accept only certain types of cookies or to activate notifications to be informed each time about a website attempting to save a cookie on your device. The panel for managing cookies differs slightly from browser to browser. To find out more, go to the "Help" tab in your browser or visit <a href="https://www.wszystkoociasteczkach.pl">www.wszystkoociasteczkach.pl</a> (PL) / <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a> (EN).
- 5. Please note that if you disable all cookies, <a href="www.malkowski.pl">www.malkowski.pl</a> may not function properly.

# IV. Personal data collected via www.malkowski.pl.

- 1. The controller of personal data obtained through the forms placed on the website is Małkowski-Martech, Tel: (+48) 61 222 75 00, e-mail: biuro@malkowski.pl.
- 2. Contact with the controller in matters related to personal data protection is possible by e-mail at <a href="mailto:biuro@malkowski.pl">biuro@malkowski.pl</a> or by postal mail to the address of the controller's registered office with the note "Personal data protection".
- 3. Pursuant to the provisions of 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 (OJ L 119 of 04.05.2016, p. 1) (hereinafter referred to as the GDPR), personal data of the website users are processed:

- a) pursuant to Article 6(1)(a) in connection with Article 22(2)(c) of the GDPR for the purpose of automated decision-making based on profiling, in order to tailor advertisements and content to the user's individual needs in the best possible way - until the withdrawal of the consent;
- b) pursuant to Article 6(1)(a) of the GDPR, i.e. your voluntary consent given under an appropriate form for the purpose arising from the function of a given form (e.g. sending a newsletter, handling product enquiries, establishing contact) for the time of performing activities arising from the function of a given form or until the consent is withdrawn;
- c) pursuant to Article 6(1)(f) of the GDPR in order for the controller to assert claims, if any, related to the handling of requests submitted via contact forms and to conduct marketing activities promoting the controller's activity, including with the use of e-mail addresses and telephone numbers - until you object to the processing of your data on this basis.
- 4. Website users have the following rights in relation to the processing of their personal data:
  - a) the right to access their data pursuant to Article 15 of the GDPR,
  - b) the right to rectify their data pursuant to Article 16 of the GDPR,
  - c) the right to erase their data (the "right to be forgotten") pursuant to Article17 of the GDPR,
  - d) the right to restrict the processing of their data pursuant to Article 18 of the GDPR,
  - e) the right to data portability pursuant to Article 20 of the GDPR,
  - f) the right to withdraw consent at any time (without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal) pursuant to Article 7(3) of the GDPR

- 5. Website users also have the right to object to the processing of their personal data pursuant to Article 6(1)(f) of the GDPR.
- 6. Website users also have the right to lodge a complaint to the President of the Office for Personal Data Protection if they believe that the processing of their personal data by Małkowski-Martech violates the provisions of the GDPR, the Act of 10 May 2018 on Personal Data Protection (Journal of Laws of 2018, item 1000, as amended) and any other national regulations for the application of the GDPR.
- 7. Personal data of website users may be transferred to the following recipients:
  - a) entities from the ASSA ABLOY AB group based in Stockholm (Sweden), including Assa Abloy Opening Solutions Poland S.A. with its registered office at ul. Magazynowa 4, 64-100 Leszno.
  - b) other entities cooperating with Małkowski-Martech in pursuing the purposes of processing referred to in section 3.
- 8. If you give your consent, your personal data will be processed by Małkowski-Martech on the basis of automated decision-making, including profiling. Technologies storing and accessing information stored on the your terminal equipment (in particular through the use of cookies) allow Małkowski-Martech to assess your activity and, on its basis, to adjust advertising and content presented on the website to your individual preferences. A detailed technical description of profiling of users can be found in point VI of this Privacy Policy.
- 9. Providing data via forms placed on the website is voluntary but necessary to use the functionality of particular forms.
- 10. Małkowski-Martech does not transfer your personal data to third countries (i.e. outside the European Union or European Economic Area) or to international organisations.
- V. Personal data of Customers and Contractors of Małkowski-Martech - general information clause

- 1. The controller of your personal data is Małkowski-Martech, Tel: (+48) 61 222 75 00, e-mail: biuro@malkowski.pl.
- Contact with the controller in matters related to personal data protection is possible
  by e-mail at <a href="mailto:biuro@malkowski.pl">biuro@malkowski.pl</a> or by postal mail to the address of the controller's
  registered office with the note "Personal data protection".

#### 3. The Controller processes personal data of:

#### 1) Customers:

- a) pursuant to Article 6(1)(b) of the GDPR for the purpose of taking actions aimed at concluding an agreement and performing the concluded agreements (including contact via telephone and e-mail, sending documents related to services provided and other) - for the time of performing the agreement;
- b) pursuant to Article 6(1)(c) of the GDPR for the purpose of fulfilling the Controller's obligations arising from applicable law, including in particular obligations arising from tax law until such obligations are fulfilled or expire;
- c) pursuant to Article 6(1)(f) of the GDPR for purposes resulting from the Controller's legitimate interests, including in particular for asserting, establishing and defending claims, for archiving and statistical purposes and for the purposes of direct marketing - until an objection to processing is raised or until the statute of limitations for claims/the Controller's legitimate interest expires;
- d) pursuant to Article 6(1)(a) of the GDPR if appropriate consent is given, for the purpose of sending commercial information and promoting own services
   - until the consent is withdrawn;

#### 2) Contractors who are natural persons:

 a) pursuant to Article 6(1)(b) of the GDPR - for the purpose of concluding and performing agreements binding the Controller - for the term of the agreement;

- b) pursuant to Article 6(1)(c) of the GDPR for the purpose of fulfilling the Controller's obligations arising from applicable law, including in particular obligations arising from tax law until such obligations are fulfilled or expire;
- c) pursuant to Article 6(1)(f) of the GDPR for purposes resulting from the Controller's legitimate interests, including in particular for asserting, establishing and defending claims, for archiving and statistical purposes and for the purposes of direct marketing - until an objection to processing is raised or until the statute of limitations for claims/the Controller's legitimate interest expires;
- d) pursuant to Article 6(1)(a) of the GDPR if appropriate consent is given, for the purpose of sending commercial information and promoting own services - until the consent is withdrawn;
- 3) persons staying on the Controller's premises pursuant to Article 6(1)(f) of the GDPR - in the form of image recorded by a video surveillance system - for the purpose of ensuring the safety of persons staying on the Controller's premises and protecting property, as well as for the purpose of keeping secret information the disclosure of which could expose the Controller to damage for the period of storing video surveillance system recordings, no longer than 3 months after the recorded event.
- 4. You have the following rights to the extent resulting from the GDPR:
  - a) the right to access their data pursuant to Article 15 of the GDPR,
  - b) the right to rectify their data pursuant to Article 16 of the GDPR,
  - c) the right to erase their data (the "right to be forgotten") pursuant to Article17 of the GDPR,
  - d) the right to restrict the processing of their data pursuant to Article 18 of the GDPR,
  - e) the right to data portability pursuant to Article 20 of the GDPR,
  - f) the right to withdraw consent at any time (without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal) pursuant to Article 7(3) of the GDPR

- 5. You also have the right to object to the processing of your personal data pursuant to Article 6(1)(f) of the GDPR.
- 6. You have the right to lodge a complaint to the President of the Office for Personal Data Protection if you believe that the processing of your personal data by Małkowski-Martech violates the provisions of the GDPR, the Act of 10 May 2018 on Personal Data Protection (Journal of Laws of 2018, item 1000, as amended) and any other national regulations for the application of the GDPR.
- 7. Your personal data may be transferred to the following recipients:
  - a) entities from the ASSA ABLOY AB group based in Stockholm (Sweden), including Assa Abloy Opening Solutions Poland S.A. with its registered office at ul. Magazynowa 4, 64-100 Leszno.
  - b) other entities cooperating with Małkowski-Martech in the pursuit of the purposes of processing referred to in section 3 (including IT service providers, entities cooperating with the Controller in the provision of product sales services).
- 8. Your personal data will not be processed by the Controller on the basis of automated decision-making, including profiling.
- 9. The Controller will not transfer your personal data to third countries (outside the European Union or the European Economic Area) or to international organisations.
- 10. Providing your personal data is voluntary but necessary for the purposes of processing set out in section 3.

## VI. Profiling

1. If you give your appropriate consent, the website available at <a href="www.malkowski.pl">www.malkowski.pl</a> will process your personal data using profiling. This is a form of automated data processing which aims to adapt the content provided to you via the website to your individual preferences.

- 2. You give your consent to profiling when you subscribe to the newsletter. If such consent is given, algorithms collect information which is used for profiling: information provided by you in the forms placed on the website and contained in cookies stored in your device. The information that may be contained in cookies used for profiling is: user ID, session ID, server ID, information on time spent on a given page of the website.
- 3. The results of profiling (e.g. in the form of product recommendations) will be displayed to you on the basis of information previously collected in cookies, including information collected prior to newsletter subscription. The correlation of data from cookies with your personal data provided in the forms on the website starts when you subscribe to the newsletter and give consent to profiling.

### VII. Contact details

- 1. Telephone and address of Małkowski-Martech: Czołowo, ul. Leśna 57, Kórnik (62-035); telephone: +48 61 222 75 00/+48 61 222 75 01; e-mail: biuro@malkowski.pl
- 2. Enquiries for quotation: telephone: +48 511 414 414; e-mail: handel@malkowski.pl
- 3. Help desk: telephone: 511 415 415/+48 61 22 27 542/+48 61 22 27 543/+48 22 27 545; e-mail: technika@malkowski.pl