

Privacy Policy

The Privacy Policy describes the principles of processing information about you, including personal data and cookies, i.e., so-called cookies.

1. General Information

- a. This policy applies to the Website operating under the URL: zawisza.com.pl; www.zpi-fo.pl
- b. The website operator and the Personal Data Administrator is: ZAWISZA PRIVATE INVESTMENTS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, Zachodnia 38, 91-063 Łódź
- c. The operator's email contact address: familyoffice@zawisza.com.pl;
- d. The operator is the Administrator of your personal data in relation to the data voluntarily provided in the Website.
- e. The Website uses personal data for the following purposes:
 - i. Newsletter operations
 - ii. Presentation of the user profile to other users
 - iii. Handling inquiries through the form
 - iv. Execution of ordered services
 - v. Presentation of the offer or information
- f. The Website performs the functions of obtaining information about users and their behavior in the following way:
 - i. By voluntarily entering data in forms, which are entered into the Operator's systems.
 - ii. By storing cookie files (so-called "cookies") in end devices.

2. Selected methods of data protection employed by the Operator

- a. The places of logging in and entering personal data are protected in the transmission layer (SSL certificate). As a result, the personal data and login data, entered on the website, are encrypted on the user's computer and can only be read on the target server.
- b. Personal data stored in the database are encrypted in such a way that only the Operator possessing the key can read them. Thus, the data is protected in case the database is stolen from the server.
- c. To protect data, the Operator regularly makes backup copies.
- d. An essential element of data protection is the regular updating of all software used by the Operator to process personal data, which in particular means regular updates of software components.

3. Hosting

- a. The service is hosted (technically maintained) on the operator's servers: cyberFolks.pl
- b. The hosting company, to ensure technical reliability, conducts server-level logs. The recording may include:

- i. resources identified by URL identifier (addresses of requested resources – pages, files),
 - ii. time of query arrival,
 - iii. time of response sending,
 - iv. name of the client station - identification performed by HTTP protocol,
 - v. information about errors that occurred at the transaction HTTP,
 - vi. URL address of the page previously visited by the user (referer link) – in case the transition to the Service occurred through a link,
 - vii. information about the user's browser,
 - viii. information about the IP address,
 - ix. diagnostic information related to the self-service process of ordering services through the website,
 - x. information related to the handling of electronic mail directed to and sent by the Operator.
4. Your rights and additional information on how data is used
 - a. In certain situations, the Administrator has the right to transfer your personal data to other recipients, if it is necessary to perform the contract concluded with you or to fulfill the obligations incumbent on the Administrator. This applies to such groups of recipients:
 - i. hosting company on the basis of entrustment
 - ii. banks
 - iii. public authorities
 - iv. authorized employees and associates, who use data to achieve the purpose of the site
 - v. companies providing marketing services for the Administrator
 - b. Your personal data processed by the Administrator no longer than is necessary to perform related actions specified by separate regulations (e.g., on accounting). Regarding marketing data, they will not be processed for longer than 3 years.
 - c. You have the right to request from the Administrator:
 - i. access to personal data concerning you,
 - ii. theirrectification,
 - iii. erasure,
 - iv. restriction of processing,
 - v. and data portability.
 - d. You have the right to object to the processing indicated in point 3.2 against processing of personal data for the purpose of performing legally justified interests pursued by the Administrator, including profiling, whereas the right of objection cannot be exercised if there are valid legally justified grounds for processing, overriding your interests, rights, and freedoms, in particular for the establishment, exercise, or defense of legal claims.

- e. You have the right to lodge a complaint with the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.
 - f. Providing personal data is voluntary, but necessary to service the Website.
 - g. You may be subject to automated decision-making, including profiling, for the purpose of providing services within the concluded agreement and for the Administrator to conduct direct marketing.
 - h. Personal data are not transferred to third countries within the meaning of data protection regulations. This means that we do not send them outside the European Union.
5. Information in forms
- a. The Website collects information voluntarily provided by the user, including personal data, if they are provided.
 - b. The Website may save information about connection parameters (time stamp, IP address).
 - c. In certain situations, the Website may save information facilitating the linking of data in the form with the email address of the user filling out the form. In such cases, the user's email address appears inside the url of the page containing the form.
 - d. Data provided in the form are processed for the purpose resulting from the function of a specific form, e.g., to process a service request or commercial contact, service registration, etc. Each time, the context and description of the form in a clear way inform what it is used for.
6. Administrator's Logs
- a. Information on the behavior of users in the service may be logged. These data are used to administer the service.
7. Essential marketing techniques
- a. The Operator uses statistical analysis of website traffic through Google Analytics (Google Inc. based in the USA). The Operator does not pass personal data to the operator of this service, only anonymized information. The service is based on the use of cookies in the user's end device. In terms of information about user preferences gathered by the Google advertising network, the user can view and edit information derived from cookies using the tool:
<https://www.google.com/ads/preferences/>
 - b. The Operator uses remarketing techniques, allowing for matching advertising messages to the user's behavior on the site, which may give the illusion that the user's personal data is used to track him, but in practice, no personal data is transferred from the Operator to the advertisers. The technological condition for such activities is the enabled handling of cookies.
 - c. The Operator uses a solution that examines user behavior by creating heat maps and recording behavior on the site. This information is anonymized before being sent to the service operator so that he does

not know to whom it relates. Specifically, recording does not include entered passwords and other personal data.

8. Information about cookies
 - a. The Website uses cookies.
 - b. Cookies (so-called "cookies") are IT data, in particular text files, which are stored in the Website User's end device and are intended for use with the Website's pages. Cookies usually contain the name of the website they come from, the time they are stored on the end device, and a unique number.
 - c. The entity placing cookies on the Website User's end device and accessing them is the Website operator.
 - d. Cookies are used for the following purposes:
 - i. maintaining the Website user's session (after logging in), thanks to which the user does not have to re-enter the login and password on every subpage of the Website;
 - ii. achieving the goals set out above in the part "Essential marketing techniques";
 - e. The Website uses two main types of cookies: "session" (session cookies) and "permanent" (persistent cookies). "Session" cookies are temporary files that are stored in the User's end device until logging out, leaving the website, or disabling the software (web browser). "Permanent" cookies are stored in the User's end device for the time specified in the cookies' parameters or until they are deleted by the User.
 - f. Web browsing software (web browser) usually by default allows storing cookies on the User's end device. Website Users can change the settings in this area. The web browser allows you to delete cookies. It is also possible to automatically block cookies. Detailed information on this subject is provided in the help or documentation of the web browser.
 - g. Restrictions on the use of cookies may affect some of the functionalities available on the Website's pages.
 - h. Cookies placed on the Website User's end device may also be used by entities cooperating with the Website operator, especially this applies to companies: Google (Google Inc. based in the USA), Facebook (Facebook Inc. based in the USA), Twitter (Twitter Inc. based in the USA).
9. Managing cookies – how to express and withdraw consent in practice?
 - a. If the user does not want to receive cookies, they may change the browser settings. We reserve that disabling the handling of cookies necessary for authentication processes, security, maintaining user preferences can make it difficult, and in extreme cases, may prevent the use of www websites
 - b. To manage the cookies settings, choose from the list below the web browser you use and follow the instructions:

- i. [Edge](#)
- ii. [Internet Explorer](#)
- iii. [Chrome](#)
- iv. [Safari](#)
- v. [Firefox](#)
- vi. [Opera](#)

Mobile devices:

- vii. [Android](#)
- viii. [Safari \(iOS\)](#)
- ix. [Windows Phone](#)