

Privacy Policy

Since maintaining the confidentiality of the information you provide is equally important to us, this Privacy Policy outlines the purpose and methods of data processing and sets forth our obligations regarding the data entrusted to us.

This Privacy Policy sets forth the rules for the processing of and access to information on the website: <https://kempuri.com> on your devices as Users, used to provide services delivered electronically

§ 1

Definitions

1. **“Controller”** means a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; if the purposes and means of such processing are determined by Union or Member State law, a controller may also be designated by Union or Member State law, or specific criteria for its designation may be laid down.
2. **“Personal data”** means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
3. **“Processing”** means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adapting or modifying, retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making available, aligning or combining, restricting, erasing, or destroying.
4. **“Data recipient”** means a natural or legal person, public authority, agency, or other body to whom personal data is disclosed, whether or not that body is a third party.
5. **“Consent of the data subject”** means a freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
6. **“Cookies”** – means IT data, in particular small text files, saved and stored on devices through which the User accesses the Website’s web pages.
7. **“Website”** – means the website at which the Administrator operates the online service, operating under the domain <https://kempuri.com>
8. **“Device”** – means an electronic device through which the User accesses the Website’s web pages.
9. **“User”** – means an entity to whom, in accordance with the Terms of Service and applicable law, services may be provided electronically or with whom an Agreement for the Provision of Electronic Services may be concluded.

10. **“GDPR”** – Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 (General Data Protection Regulation).

§ 2

Personal Data Controller

1. The controller of your personal data is: Kempuri Sp. z o.o., with its registered office in Warsaw at ul. Postępu 15, 02-676, entered in the Register of Entrepreneurs of the National Court Register under KRS No. 0000982273, NIP: 5213977856, REGON: 52266391400000, acting as the owner of the brand and the website <https://kempuri.com>

Administrator’s contact information:

- mailing address: ul. Postępu 15, Warsaw 02-676, with the note “Personal Data”

2. The Administrator has appointed Mr. Mariusz Zajkiewicz as the Data Protection Officer DPO’s contact information:

- email address: legal@kempuri.com

§3

Purpose and Legal Basis for the Processing of Personal Data

Your personal data will be processed for the following purposes:

a) performance of the contract for the provision of electronic services—in accordance with Article 6(1)(b) of the GDPR,

b) marketing products and services—the legal basis for processing is Article 6(1)(a) “consent” of the GDPR,

c) handling complaints, claims, and requests, and providing responses in connection with such activities pursuant to Article 6(1)(c) of the GDPR

d) the potential establishment, investigation, enforcement of claims, or defense against claims, which constitute the legitimate interests of the Controller (such as debt collection, conducting court and enforcement proceedings) pursuant to Article 6(1)(f) of the GDPR,

e) preventing abuse and fraud—to ensure the security of the Services provided in accordance with Article 6(1)(f) of the GDPR,

f) storing your preferences and settings such as: login, password, IP address, date and time of login – in such cases, the basis for processing will be Article 6(1)(f) of the GDPR in conjunction with Article 399 of the Electronic Communications Act

§ 4

Scope of Personal Data Collected

1. During the registration process and subsequent use of the website <https://kempuri.com> we ask you to provide your personal data in order to provide the services offered through our website.
2. To provide these services, we require your personal data in the form of: first name, last name, email address, and data collected during the recruitment process (the specific scope of which depends on the purpose of contact)
3. The website user acknowledges that providing personal data marks the start of processing by the Administrator and is voluntary; however, failure to consent to such processing may result in the Administrator's inability to provide the service electronically via the website to the User.

§5

Retention Period for Personal Data

1. The User's personal data will be retained:
 - a) for the duration of the contract until its termination, and after the termination of services, in connection with obligations arising from generally applicable laws (e.g., tax laws), for a period of 5 years,
 - b) the period necessary for the Controller to pursue claims in connection with its business activities or to defend against claims, pursuant to generally applicable laws, taking into account the statute of limitations periods for claims specified in generally applicable laws,
 - c) if consent is given for data processing for a specific purpose—until such consent is withdrawn,
 - d) for accountability purposes, i.e., to demonstrate compliance with regulations regarding the processing of personal data, such data will be retained for the period during which the Controller is required to retain the data or documents containing it to document compliance with legal requirements and to enable inspection by public authorities.

§6

Cookies

1. When you first visit <https://kempuri.com> you will be informed about the use of cookies. Cookies are pieces of data—primarily text—that are sent by the website to your browser. Your browser, in turn, sends them back to the website during subsequent visits to maintain the

continuity of the session. They also allow specific data to be stored, so you do not have to re-enter it when returning from another website. Functional, performance, and advertising cookies will be used only on the basis of consent given by the User during their first visit to the site.

2. Cookies are used on the following legal basis

a) Article 399 of the Electronic Communications Law (the requirement to inform the User about the purposes of storing and accessing personal data, as well as the User's ability to specify the conditions for storing or accessing personal data)

b) Article 6(1)(f) of the GDPR (legitimate interest of the Data Controller)

c) Article 6(1)(a) of the GDPR (the User's consent to more advanced marketing activities, such as profiling using third-party cookies)

3. By remaining on the website, you accept the use of cookies, and failure to change your browser settings is tantamount to consenting to the use of "cookies."

4. At the same time, the use of cookies is necessary for the proper provision of services on the Website (see the Terms of Service for more details).

5. Users may change their browser settings regarding the handling and storage of cookies at any time.

6. The following types of cookies are used on the Website:

a) "essential" cookies, which enable the use of services available on the Website, e.g., cookies used for services requiring authentication on the Website and necessary to ensure security (e.g., used to detect authentication fraud on the Website);

b) "functional" cookies, which allow the Website to "remember" settings selected by the User and personalize the interface, e.g., regarding the selected language or region of the person logged in to the site, font size, website appearance, etc.;

c) "performance" cookies, which enable the collection of information about how the Website's pages are used;

d) "advertising" cookies, which enable the delivery of advertising content to Website Users that is better tailored to their interests.

e) "analytical" cookies, which enable the provision of data to the Administrator regarding how Users use the website (number of visits, duration of visits, etc.)

§7

User Rights and Obligations

1. A User who has provided the Administrator with their personal data has the right to:

- a) access their data and receive a copy of it;
- b) rectify (correct) their data;
- c) erase their data (the so-called right to be forgotten),
- d) restrict the processing of their personal data;
- e) transfer their data to another controller;
- f) object to the processing of data, as well as to processing for direct marketing purposes;
- g) withdraw consent in cases where the Administrator processes the User's data based on consent, at any time and in any manner, without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal;
- h) to lodge a complaint with the President of the Personal Data Protection Office if the User believes that the processing of personal data violates the provisions of the GDPR.

2. A complaint may be lodged with:

The President of the Personal Data Protection Office, 1A Stefana Moniuszki Street, 00-014 Warsaw.

3. In exercising the rights referred to in paragraph 1, the User may submit a request to the Administrator to perform specific actions. The request should be sent via email to: biuro@isbc.eu

4. If the User permanently deletes personal data necessary for the Administrator to provide services via the website, the User will lose the ability to use those services.

§8

Recipients of Data

1. The recipients of your processed personal data will be entities that provide and support the Administrator's ICT systems. Data transfers outside the European Economic Area are based on data protection frameworks (DPF) or standard contractual clauses.

2. To the extent justified by the purpose of processing, we will also transfer personal data to entities acting on our behalf, in particular:

- a) providers of IT services and solutions,
- b) entities providing accounting services,
- c) entities providing legal, financial, insurance, and administrative services, and

d) auditors.

§9

Final Provisions

1. In matters not covered by this Privacy Policy, the relevant provisions of Polish law shall apply.
2. The Administrator reserves the right to amend this Privacy Policy as a result of changes in legal regulations.
3. The Administrator reserves the right to amend the website's privacy policy, which may result from advances in internet technology, potential changes in data protection laws, and the development of the Website. We will notify users of any changes in a visible and understandable manner.

This Privacy Policy is effective as of