

## CHABRE IT SERVICES PRIVACY POLICY

This Privacy Policy (**Privacy Policy**) is aimed at informing users (**Users**) of the <http://www.chabre.pl> website (**Website**) about purposes and legal bases for processing personal data on the Website, the manner of using the data and about the rights available to the Users. The Users' personal data are always processed in conformity with applicable laws, including in particular pursuant to the Regulation of the European Parliament and of the Council 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 (GDPR).

### Data Controller and Owner

The Personal Data Controller and Owner is Chabre IT Services Sp. z o. o., ul. Biskupia 8/28, 04-216 Warszawa, Poland, National Court Register entry No. KRS 0000877922, Tax Id. No. (NIP) 1133026022, Industry Id. No. (REGON) 387968210 (**Controller**). Contact address: [office@chabre.pl](mailto:office@chabre.pl). Data subjects can contact the Controller also otherwise as preferred.

### Types of Personal Data

Among the types of personal data that this Website collects or that are collected through this Website (**Personal Data**) there are: Cookies and Usage data. Cookies are defined in the Cookie Policy, which constitutes an integral part of this Privacy Policy. Usage Data is information collected automatically from this Website (or third party services engaged in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Website) and the details about the path followed within the Website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment. Other Personal Data collected are described in other sections of this Privacy Policy. The Personal Data may be freely provided by the User, or collected automatically when using this Website. Any use of Cookies - or of other tracking tools - by this Website or by the owners of third party services used by this Website, unless stated otherwise, serves to identify Users and remember their preferences, for the purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Website to provide its services. Users are responsible for any Personal Data of third parties obtained, published, or shared through this Website and confirm that they have the third party's consent to provide the Data to the Controller.

### Use of Personal Data

The Personal Data concerning the User are collected to allow the Controller to provide its services. The Personal Data used for each purpose are outlined in the specific sections of this document. Personal Data are collected for the following purposes:

— **Correspondence via Contact Form or chat box:**

Personal Data are processed to pursue the Controller's legitimate interests (Art. 6.1.f of the GDPR). Personal Data are provided on a voluntary basis, but the provision thereof is necessary to receive a reply from the Controller. In such a case, Personal Data are processed due to the Controller's legitimate interests. The Controller's legitimate interests consist in communicating with an individual who requests of the Controller to provide an answer. The correspondence may be conducted for many reasons which are hard to categorize. The messages may be sent as a result of existing or possible contracts, technical advice, financial settlements, etc. Personal Data collected: name, company, e-mail, phone number, message content.

— **Recruitment process and future recruitment processes via Join us Form / Apply Form:**

Personal Data are processed in order to comply with the Controller's legal obligations resulting in particular from Art. 22 [1] of the Labor Code (Art. 6.1.c of the GDPR), and to take up activities, at the candidate's (**Candidate**) request, prior to the conclusion of an agreement and to perform an agreement (Art. 6.1.b of the GDPR). In the case of other recruitment data and for the purpose of future recruitment processes – also on the basis of consent of the Candidate (Art. 6.1.a of the GDPR). The provision of Personal Data is a statutory requirement and is necessary for an agreement to be concluded; if they are not provided, it shall be impossible to conclude an agreement. In the case of other recruitment data and for the purpose of future recruitment processes the consent may be withdrawn at any time – without affecting the lawfulness of processing prior to the withdrawal. Personal Data collected: name, e-mail, phone number, link to LinkedIn, data from the CV.

— **Activities prior to the conclusion of an agreement, commercial information via Let's Talk Form:**

Personal Data are processed in order to take up activities, at the User's request, prior to the conclusion of an agreement (e.g. to submit an offer) and to perform an agreement (Art. 6.1.b of the GDPR). Providing personal data is necessary for an agreement to be concluded; if they are not provided, it shall be impossible to conclude an agreement. For the purpose of commercial and marketing information, Personal Data are processed on the basis of consent of a data subject (Art. 6.1.a of the GDPR), and in the case of direct marketing – also to pursue the Controller's legitimate interests (Art. 6.1.f of the GDPR). The Controller contacts the Users who have provided their e-mail address and/or phone number for this purpose. Personal Data are provided on a voluntary basis. The User may withdraw their consent at any time – without affecting the lawfulness of processing prior to the withdrawal. In the case of sending the Controller's commercial and/or marketing information, a legal basis for processing, including profiling, involves the Controller's legitimate interest. The Controller's legitimate interest consists in carrying out direct marketing activities. Personal Data collected: name, company, e-mail, phone number, customer needs.

— **Pursuit of and protection against legal claims, fraud prevention, statistics and analytics, ensuring ICT environment security, application of internal control systems, financial settlements:**

Personal Data are processed to pursue the Controller's legitimate interests (Art. 6.1.f of the GDPR). The Controller's legitimate interest consists in a possibility to undertake the aforementioned activities (protection against legal claims, fraud prevention, statistics and analytics, visualization service, ensuring ICT environment security, application of internal control systems). Personal Data may be used for legal purposes by the Controller, in Court or in the stages leading to possible legal action arising from

improper use of the Website. Google Analytics is a web analysis service provided by Google Inc. (Google). Google utilizes the Personal Data collected to track and examine the use of the Website, to prepare reports on its activities and share them with other Google services. Google may use the Personal Data collected to contextualize and personalize the ads of its own advertising network. Google Fonts is a typeface visualization service provided by Google that allows the Website to incorporate content of this kind on its pages. Personal Data collected: Cookie and Usage data. In the case of financial settlements, Personal Data are processed in order to comply with the Controller's legal obligations resulting in particular from accounting policies and tax related regulations (Art. 6.1.c of the GDPR). The provision of Personal Data is a statutory requirement. Personal Data collected: Cookie and Usage data, claims data, fraud prevention data, security data, internal control data, financial data.

### Recipients of Personal Data

Personal Data may be processed by the Controller's service providers rendering, among others, financial settlements, legal, advisory, consulting, audit, marketing, archiving, IT, courier, postal services. A subset of Candidate's data may be shared with a partner company if a Candidate agrees. The updated list of these recipients may be requested from the Controller at any time. The Users' Personal Data will not be shared with any other third parties, unless this proves necessary and the User consents thereto or a data disclosure obligation result from mandatory rules of law, a final and non-appealable court judgment or a final decision of a public authority. On the Website, there can be references to other webpages (e.g. partner company's webpages). The Controller shall not be liable for the processing of Personal Data connected with the use of these webpages by the User. Having moved to the other webpages, the User should first consult their privacy policies and personal data protection procedures. The Controller shall not transfer personal data to any third parties outside the EEA or to any international organizations unless this proves necessary, e.g. for the recruitment process. The Personal Data will be transferred only if the recipient complies with GDPR requirements.

### Information for users who use our Fan page in Facebook, Instagram account or LinkedIn or another social media

#### — Facebook and Instagram

Fan page Chabre IT Services, [Chabre-IT-Services-Facebook](#) and Instagram account are available as part of the website [www.Facebook.com](http://www.Facebook.com). Conditions and rules for the use of personal data on the website you can find in: <https://www.facebook.com/privacy/policy>.

#### — LinkedIn

Our profile in LinkedIn.com, [www.linkedin.com/company/chabre-it-services](http://www.linkedin.com/company/chabre-it-services) is available as part of the website LinkedIn.com. Conditions and rules for the use of personal data on the website you can find in: <https://pl.linkedin.com/legal/privacy-policy>

Chabre IT Services as data controller can see information's about statistical visits in his profile, visitors, their activities and comments. We process personal data anytime you use button: "Like it", "observing" and "share". Personal data collected: Name and sur name, Nick, ID, profile photo or another images (included private images) , comments content, automatically collected technical data about visits in social network. Keeping profiles on social networks is for promotion and building our brand. Activities serves to connect and maintaining business connection, which constitute//which is the implementation

of legitimate interests (Art. 6.1.f of the GDPR). Personal data are processed for statistical, and also advertising implemented through the tools provided by the applications of individual social networking sites - also to pursue the Controller's legitimate interests (Art. 6.1.f of the GDPR). Using communication, also from the chat box, thanks to the solutions proposed by Facebook via Messenger, you agree with the policy of the portal's policy.

### **Personal Data Profiling**

Profiling consists in any form of automated processing of Personal Data evaluating the personal aspects relating to a natural person, in particular to analyze or predict aspects concerning a data subject's work performance, economic situation, health, personal preferences or interests, reliability or behavior, location or movements, where it produces legal effects concerning the data subject or similarly significantly affects the data subject. If, following the Website's development, Personal Data were to be profiled, the Controller will inform the Users thereof, and profiling will be carried out in accordance with relevant regulations. In case of profiling, the Controller shall implement appropriate measures safeguarding rights, freedoms and legitimate interests of the Users, including ensuring an option of a human intervention at the Controller's side and a possibility to express a personal position and challenge a decision.

### **Rights of Users**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Users have the right to data portability and the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Requests should be sent to the Controller at the contact information set out above. Users can contact the Controller also otherwise as preferred. The Website does not support "Do Not Track" requests. To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies. Users have the right to file a complaint with the President of the Personal Data Protection Office if they consider that their Personal Data are processed in breach of mandatory rules of law.

### **Mode and place of processing Personal Data**

The Controller processes Personal Data of the Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Personal Data. The Personal Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In particular, the Controller makes use of data encryption, physical security measures and verification in IT systems. Further, the Controller uses anti-virus software and firewalls. The Users' data may be accessed exclusively by authorized individuals bound by confidentiality and subcontractors that have entered into personal data sub-processing agreements with the Controller. The Personal Data are processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Controller.

## Retention Time

Personal Data are kept for the time necessary to provide the Website services, or stated by the purposes outlined in this document, and the User can always request that the Controller suspend or remove the data. Upon the lapse of a processing period, in the absence of any bases for processing, personal data shall be permanently deleted or anonymized. The Users' Personal Data shall be processed in the following periods:

- in connection with correspondence – personal data shall be processed for a period necessary to provide the User with an answer or until the User raises an effective objection. The correspondence may be one-time, regular or rare but with new messages every now and then. Therefore, it may be stored due to possible continuation of discussions. Current relevance of Personal Data is, however, checked at least once a year;
- in connection with recruitment process and future recruitment processes – the Candidate's data will be processed for the duration of the recruitment process and as regards any potential claims, for the period of 3 years. In order to use the Candidate's data in future recruitment processes and in case of other recruitment data, this data will be processed until consent is withdrawn but no longer than for a period of 5 years.
- in connection with activities prior to the conclusion of an agreement and in connection with commercial information – in connection with activities prior to the conclusion of an agreement Personal Data shall be processed until either party resigns from concluding an agreement, regardless of a reason; in connection with commercial information Personal Data shall be processed until consent is withdrawn or an objection is effectively raised – in case the consent is not required;
- in connection with pursuit of and protection against legal claims, fraud prevention, statistics and analytics, ensuring ICT environment security, application of internal control systems – Personal Data can be processed until any potential legal claims are time-barred or for as long as is possible or required in compliance with applicable laws. In particular, if a processing period based on a given legal basis has expired, this shall not mean that Personal Data may not be processed based on another legal basis;
- In connection with financial settlements – Personal Data shall be processed for a period of five years from the end of a calendar year when a transaction has been conducted.

## Changes to the Privacy Policy

This Privacy Policy and any changes to this Privacy Policy shall apply when they are published on the Website. It is strongly recommended to check the Website often, referring to the date of the last modification listed below. If a User objects to any of the changes to the Privacy Policy, the User must cease using the Website and can request that the Controller removes the Personal Data. Unless stated otherwise, the then-current Privacy Policy applies to all Personal Data the Controller has about Users. The Cookie Policy is attached to this document and constitutes its integral part.

**More details concerning the collection or processing of Personal Data may be requested from the Controller at any time. Please see the contact information at the beginning of this document.**

**The current version of the Privacy Policy is from: 17.08.2022**

## CHABRE IT SERVICES COOKIE POLICY

This Cookie Policy (**Cookie Policy**) is aimed at informing users (**Users**) of the <http://www.chabre.pl> website (**Website**) about purposes of storing and gaining access to Cookies in the Users' terminal equipment and about options to set terms of storing or gaining access to the Cookies through browser settings or Website configuration. The Website's Controller might store the Cookies in the Users' terminal equipment and have access thereto.

### Cookies

Cookies are information saved in text files sent by the Website to the User's browser and resent by the User's browser when the User re-visits the Website (**Cookies**). Cookies are stored in the User's terminal equipment (computer, laptop, smartphone). They are used to maintain the User's session and to save other data so that the User does not need to enter the same information whenever they use the Website. Among other things, Cookies remember a website name, data of the User's browser, unique settings and a period for which the data will be stored. Data saved in the Cookies are usually not matched with individual Users of the Website.

### Website Controller and Owner

The Website Controller and Owner is Chabre IT Services Sp. z o. o., ul. Biskupia 8/28, 04-216 Warszawa, Poland, National Court Register entry No. KRS 0000877922, Tax Id. No. (NIP) 1133026022, Industry Id. No. (REGON) 387968210 (**Controller**). Contact address: [office@chabre.pl](mailto:office@chabre.pl). Users can contact the Controller also otherwise as preferred.

### Types of Cookies

The Website uses Cookies to improve User's experience while navigating through the Website. Out of these, the Cookies that are categorized as necessary are stored on User's browser as they are essential for the working of basic functionalities of the website. The Controller also uses third-party Cookies that help the Controller analyze and understand how the User uses the Website. These Cookies will be stored in the User's browser only with the User's consent. The User also have the option to opt-out of these Cookies. Opting out of some of the Cookies may affect User's browsing experience.

### Necessary Cookies

Always enabled. Essential for the Website to function properly. These Cookies ensure basic functionalities and security features of the Website, anonymously. Necessary Cookies:

Name	Expiration	Set by	Purpose
acf	expires immediately	ACF	provide functions across pages
pll_language	persistent	PolyLang	store language settings
wp-settings-*	persistent	WordPress	store user preferences
wp-settings-time-*	1 year	WordPress	store user preferences
wordpress_test_cookie	session	WordPress	read if cookies can be placed
wordpress_logged_in_*	persistent	WordPress	store logged in users
cookiebar	1 year	WordPress	checks if user has seen cookiebar

## Marketing Cookies

Enabled or disabled. Disabled by default. Help to analyze certain actions like arriving to the Website paid campaigns and ads. Marketing Cookies:

Name	Expiration	Set by	Purpose
__fb_chat_plugin	persistent	Facebook	store and track interaction
_js_datr	2 years	Facebook	store user preferences
_fbc	2 years	Facebook	store last visit
fbm*	1 year	Facebook	store account details
xs	3 months	Facebook	store a unique session ID
fr	3 months	Facebook	provide ad delivery or retargeting
act	90 days	Facebook	store logged in users
_fbp	3 months	Facebook	store and track visits across websites
datr	2 years	Facebook	provide fraud prevention
c_user	30 days	Facebook	store a unique user ID
sb	2 years	Facebook	store browser details
*_fbm_	1 year	Facebook	store account details

## Analytics Cookies

Enabled or disabled. Disabled by default. Used to understand how visitors interact with the Website. These Cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc. Service form Google Analytics script:

Name	Expiration	Set by	Purpose
_ga	2 years	Google Analytics	store and count pageviews
_gid	1 day	Google Analytics	store and count pageviews
_gat	1 minute	Google Analytics	read and filter requests from bots

## Others

Enabled or disabled. Disabled by default.

Name	Expiration	Set by	Purpose
wd	1 week	Facebook	read screen resolution
csm	90 days	Facebook	provide fraud prevention
actppresence	session	Facebook	store and track if the browser tab is active

## How do I turn the Cookies off?

It is possible to stop your browser accepting Cookies, or to stop or restrict it accepting Cookies from the Website. All modern browsers allow you to change your Cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser. In order to understand these settings you should use the 'Help' option in your browser for more details; however, any stopping or restricting of the Cookies may affect the Website's quality or even prevent the proper display of the Website on the User's terminal equipment.

### **Changes to the Cookie Policy**

This Cookie Policy and any changes to this Cookie Policy shall apply as of the moment when they are published on the Website. It is strongly recommended to check the Website often, referring to the date of the last modification listed below. If a User objects to any of the changes to the Cookie Policy, the User must cease using the Website and/or remove the Cookies from the terminal equipment.

**The current version of the Cookie Policy is from: 17.08.2022**