

## 1. GENERAL PROVISIONS

1.1. This Privacy Policy is for informational purposes only, meaning that it does not create any obligations for Service Users or Clients. The Privacy Policy primarily sets out the principles regarding the processing of personal data by the Controller, including the legal basis, purposes, and duration of personal data processing, as well as the rights of data subjects. Additionally, it provides information on the use of cookies and analytical tools.

1.2. The Controller of personal data is „WOROL” Sp. z o.o., ul. Szkolna 3, Lasocice, 64-100 Leszno, KRS 0000444128 NIP 6972307189 REGON 302298532 (hereinafter referred to as the “Company” or the “Controller”).

The Controller has appointed a Data Protection Officer, Ms. Monika Zygmunt-Jakuć, who can be contacted via email at: [iod@worol.pl](mailto:iod@worol.pl).

1.3. The Controller processes personal data in compliance with applicable legal regulations, in particular with 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 (General Data Protection Regulation, hereinafter referred to as “GDPR” or the “GDPR Regulation”).

1.4. The provision of personal data by users of the website is voluntary.

1.5. The Controller takes special care to protect the interests of individuals whose personal data it processes. In particular, the Controller is responsible for ensuring that the collected data:

- (1) is processed lawfully;
- (2) is collected for specified, lawful purposes and not further processed in a way incompatible with those purposes;
- (3) is factually correct and adequate in relation to the purposes for which it is processed;
- (4) is stored in a form that permits identification of data subjects for no longer than necessary for the purposes of processing; and
- (5) is processed in a manner ensuring appropriate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage, using appropriate technical or organisational measures.

**1.6.** Taking into account the nature, scope, context, and purposes of processing, as well as the risk of infringement of the rights or freedoms of natural persons with varying degrees of probability and severity, the Controller implements appropriate technical and organisational measures to ensure that processing is carried out in accordance with the GDPR and that compliance can be demonstrated. These measures are reviewed and updated as necessary. The Controller applies technical measures to prevent unauthorised access to and modification of personal data transmitted electronically.

## **2. LEGAL BASIS FOR DATA PROCESSING**

**2.1.** The Controller is authorised to process personal data when—and to the extent that—at least one of the following conditions is met:

- (1) The data subject has given consent for the processing of their personal data for one or more specific purposes;
- (2) The processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract;
- (3) The processing is necessary for compliance with a legal obligation to which the Controller is subject; or
- (4) The processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject that require protection of personal data, particularly where the data subject is a child.

**2.2.** The Controller may process personal data only when at least one of the legal bases outlined in section 2.1 of this Privacy Policy is met. The specific legal bases for processing the personal data of Service Users and Clients by the Controller are detailed in the following section of the Privacy Policy, in relation to the specific purposes for which the Controller processes personal data.

## **3. PURPOSE, LEGAL BASIS, AND DURATION OF DATA PROCESSING**

**3.1.** The purpose, legal basis, duration, and recipients of personal data processed by the Controller depend on the actions taken by the respective Service User, Client, or the Controller.

**3.2.** The Controller may process personal data for the purposes, on the legal bases, and for the durations specified in the table below:

Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
Execution of the Sales Contract or Service Contract or taking action at the request of the data subject prior to entering into a contract	Article 6(1)(b) of the GDPR (performance of a contract) – the processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract	Data is stored for the period necessary to execute, terminate, or otherwise conclude the Sales Contract.
Recruitment	Article 6(1)(c) of the GDPR (legal provision, i.e. the Labour Code, and in all other respects Article 6(1)(a) of the GDPR (voluntary consent)	The data is stored for 30 days (for ongoing recruitment) and, in the case of consent for future recruitment processes, for up to one year.
Direct marketing	Article 6(1)(f) of the GDPR (legitimate interest of the controller) – the processing is necessary for the purposes of the legitimate interests pursued by the Controller, including maintaining and promoting the Controller's interests and good image.	Data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than the period of limitation for the Controller's claims against the data subject in relation to the Controller's business activity. The limitation periods are determined by applicable legal regulations, including the Civil Code (e.g. for business-related

Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
		<p>claims, the primary limitation period is typically three years, and for sales contracts, it is two years).</p> <p>The Controller cannot process the data for direct marketing purposes if the data subject expresses an effective objection in this regard.</p>
Marketing	Article 6(1)(a) of the GDPR Regulation (consent) – the data subject has consented to the processing of their personal data by the Controller for marketing purposes	Data is stored until the data subject withdraws their consent for further processing of their data for this purpose.
Keeping accounting records	Article 6(1)(c) of the GDPR Regulation in connection with Article 86(1) of the Tax Ordinance, i.e. of 17 January 2017 (Dz.U. [Journal of Laws] of 2017, item 201, as amended) – the processing is necessary for compliance with a legal obligation to which the Controller is subject	Data is stored for the period required by legal provisions mandating the Controller to retain accounting records (until the statute of limitations for tax obligations expires unless tax laws state otherwise).

Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
The establishment, pursuit, or defence of claims that may be raised by the Controller or claims that may be brought against the Controller	Article 6(1)(f) of the GDPR (legitimate interest of the controller) – the processing is necessary for the purposes of the legitimate interests pursued by the Controller, which involve the establishment, pursuit, or defence of claims that may be raised by the Controller or claims that may be brought against the Controller	Data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than the limitation period for claims that may be brought against the Controller (the primary limitation period for claims against the Controller is six years).
Use of the website and ensuring its proper functioning	Article 6(1)(f) of the GDPR (legitimate interest of the controller) – the processing is necessary for the purposes of the legitimate interests pursued by the Controller, which involve the operation and maintenance of the website, including the use of the contact form	Data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than the period of limitation for the Controller's claims against the data subject in relation to the Controller's business activity.
Keeping statistics and analysing website traffic	Article 6(1)(f) of the GDPR (legitimate interest of the controller) – the processing is necessary for the purposes of the	Data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than the period of

Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
	legitimate interests pursued by the Controller, which involve keeping statistics and analysing website traffic	limitation for the Controller's claims against the data subject in relation to the Controller's business activity.
Video monitoring	Article 6(1)(f) of the GDPR (legitimate interest of the controller) – the processing is necessary for the purposes of the legitimate interests pursued by the Controller, which involve the supervision of the safety of persons and property and the supervision of production	Data is stored for a period of up to 90 days.
Ongoing business contacts of individuals representing the contracting party and persons designated for contact in the performance of the contract	Article 6(1)(f) of the GDPR (legitimate interest of the controller) – the processing is necessary for the purposes of the legitimate interests pursued by the Controller, which involve conducting business activities (providing information within the framework of executed contracts,	Data is stored for the duration of the contract concluded between the Controller and the entity with which it cooperates, and until the expiry of claims related to the executed contract and the processed data, but no longer than six years from the end of the calendar year in which the contract with the entity was terminated.

Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
	maintaining ongoing contact with the entity)	

#### 4. DATA RECIPIENTS

4.1. For proper functioning, the Controller must use the services of external entities (such as a software provider, courier or payment processing entity). The Controller only uses the services of data processors who provide sufficient guarantees for implementing appropriate technical and organisational measures to ensure that processing complies with the GDPR and protects the rights of data subjects.

4.2. Personal data may be transferred by the Controller to a third country; however, the Controller ensures that in such a case, the transfer will only be made to a country that guarantees an adequate level of protection in compliance with the GDPR. If data is transferred to other countries, such transfer will be based on standard data protection clauses. The Controller ensures that data subjects have the right to obtain a copy of their data. The Controller transfers collected personal data only when necessary and only to the extent required to fulfil the specific purpose of data processing, in accordance with this Privacy Policy.

4.3. The transfer of data by the Controller does not occur in every case and not to all recipients or categories of recipients indicated in this Privacy Policy. The Controller transfers data only when necessary for fulfilling the specific purpose of data processing and only to the extent required to achieve that purpose. For example, if a Client chooses in-person pick-up, their data will not be shared with a carrier cooperating with the Controller.

4.4. Personal data of Service Users and Clients may be transferred to the following recipients or categories of recipients:

4.4.4. service providers supplying the Controller with technical, IT, and organisational solutions that enable the Controller to conduct business activities (in particular, providers of computer software, email and hosting services, as well as software for business management and technical support for the Controller) – the Controller shares the collected personal data of the Client with the selected service provider acting on its behalf only when necessary and only to the extent required to fulfil the specific purpose of data processing in accordance with this Privacy Policy;

4.4.5. providers of accounting, legal, and advisory services supporting the Controller in accounting, legal, or consulting matters (including accounting firms, law firms, or debt collection agencies) – the Controller shares the collected personal data of the Client

with the selected service provider acting on its behalf only when necessary and only to the extent required to fulfil the specific purpose of data processing in accordance with this Privacy Policy.

## **5. PROFILING**

**5.1.** The GDPR imposes an obligation on the Controller to inform about automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR, and – at least in such cases – to provide significant information regarding the principles of decision-making, as well as the significance and expected consequences of such processing for the data subject. Considering this, the Controller provides information in this section of the privacy policy regarding potential profiling.

**5.2.** The Controller does not engage in profiling.

## **6. RIGHTS OF THE DATA SUBJECT**

**6.1.** Right to access, rectification, restriction, erasure, or data portability – the data subject has the right to request from the Controller access to their personal data, its rectification, erasure (“right to be forgotten”), or restriction of processing, as well as the right to object to processing. The data subject also has the right to data portability. Detailed conditions for exercising these rights are specified in Articles 15–21 of the GDPR.

**6.2.** Right to withdraw consent at any time – if the Controller processes personal data based on the data subject’s consent (under Article 6(1)(a) or Article 9(2)(a) of the GDPR), the data subject has the right to withdraw consent at any time without affecting the lawfulness of processing carried out based on consent before its withdrawal.

**6.3.** Right to lodge a complaint with a supervisory authority – if the Controller processes a data subject’s personal data, the data subject has the right to lodge a complaint with a supervisory authority in the manner and procedure specified in the GDPR and Polish law, particularly under the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office (*Prezes Urzędu Ochrony Danych Osobowych*).

**6.4.** Right to object – the data subject has the right to object at any time – on grounds relating to their particular situation – to the processing of their personal data based on Article 6(1)(e) (public interest or official authority) or Article 6(1)(f) (legitimate interest of the controller), including profiling based on these provisions. In such a case, the Controller may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defence of legal claims.



**6.5.** Right to object to direct marketing – if personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of their personal data for such marketing, including profiling, to the extent that the processing is related to such direct marketing.

**6.6.** To exercise the rights mentioned in this section of the Privacy Policy, the data subject may contact the Controller by sending a written request or an email to the Controller's contact details provided at the beginning of this Privacy Policy or by using the contact form.

## **7. COOKIES AND ANALYTICS**

**7.1.** Cookies are small text-based pieces of information in the form of text files sent by a server and stored on the visitor's device (e.g. on a computer's hard drive, laptop, or memory card of a smartphone, depending on the type of device used by the visitor).

**7.2.** Cookies that may be sent via the website can be categorised based on the following criteria:

<b>Based on their provider:</b>	<b>Based on their storage duration on the visitor's device:</b>	<b>Based on their purpose:</b>
1) first-party cookies (created by the Controller's website) and 2) third-party cookies (belonging to external entities or service providers other than the Controller)	1) session cookies (stored only during a single session and deleted when the browser is closed) and 2) persistent cookies (stored for a defined period, set by the parameters of each file, until manually deleted)	1) necessary cookies (enable the proper functioning of the website), 2) functional/preference cookies (allow the website to remember user preferences and settings), 3) analytical and performance cookies (collect data on how users interact with the website), 4) marketing, advertising, and social media cookies (collect information about a person visiting a website in order to display advertisements to that person, personalise them, measure their

		effectiveness and conduct other marketing activities, including on websites other than the website, such as social networks).
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**7.3.** The Controller may process data contained in cookies when visitors use the website for the following specific purposes:

<b>Purposes of using cookies</b>	Remembering data entered into forms (necessary and/or functional/preference cookies)
	Generating anonymous statistics on website usage (analytical and performance cookies)
	Displaying and rendering advertisements, limiting the number of ad displays, and ignoring ads that the Service User does not want to see, measuring ad effectiveness and personalising ads by analysing visitor behaviour anonymously (e.g. repeated visits to specific pages, keyword searches) to create user profiles and deliver targeted ads based on predicted interests. This applies even when users visit other websites within the advertising network of Google Ireland Ltd. and Facebook (Meta Platforms Ireland Ltd.) (marketing, advertising, and social media cookies)

**7.4.** Checking in the most popular web browsers which cookies (including their duration and provider) are currently being sent by a website is possible in the following ways:

<b>In Chrome:</b>  (1) Click the lock icon in the address bar (on the left side). (2) Go to the “Cookies” tab.	<b>In Firefox:</b>  (1) Click the shield icon in the address bar (on the left side). (2) Go to the “Allowed” or “Blocked” tab. (3) Click the section for “Cross-site tracking cookies”, “Social media trackers”,	<b>In Internet Explorer:</b>  (1) Click the “Tools” menu. (2) Go to “Internet Options”. (3) Open the “General” tab. (4) Click on “Settings”. (5) Click “View Files”.
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	or “Content with tracking elements”.	
<b>In Opera:</b> (1) Click the lock icon in the address bar (on the left side). (2) Go to the “Cookies” tab.	<b>In Safari:</b> (1) Click the “Preferences” menu. (2) Navigate to the “Privacy” tab. (3) Click “Manage Website Data”.	<b>Regardless of the browser, you can also check cookies using external tools such as:</b> <a href="https://www.cookie-matrix.com/">https://www.cookie-matrix.com/</a> or <a href="https://www.cookie-checker.com/">https://www.cookie-checker.com/</a>

7.5. By default, most web browsers available on the market automatically accept cookie storage. However, every user has the option to define the terms of cookie usage through their browser settings. This means that users can, for example, partially restrict (e.g. temporarily) or completely disable the ability to store cookies. However, in the latter case, this may affect some functionalities of the website.

7.6. Browser settings related to cookies are important in determining consent for the use of cookies on our website – according to regulations, such consent can also be expressed through web browser settings. Detailed information on how to change cookie settings and manually delete them in the most popular web browsers can be found in the browser’s help section and on the following pages (click the respective link):

[in Chrome](#)

[in Firefox](#)

[in Internet Explorer](#)

[in Opera](#)

[In Safari](#)

[in Microsoft Edge](#)

7.7. The Controller may use the services of Google Analytics and Universal Analytics, provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Controller generate statistics and analyse website traffic. The data collected within these services is processed to create aggregated statistics, which assist in website administration and traffic analysis. This data is aggregated. When using the above services, the Controller collects data such as sources and mediums through which visitors access the site, their behaviour on the website, details about devices and

browsers used to visit the site, IP addresses and domains, geographic data, and demographic information (age, gender) as well as interests.

**7.8.** Users can easily block Google Analytics from collecting information about their activity on the website. To do so, they may install the browser add-on provided by Google Ireland Ltd., available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

**7.9.** Due to the Controller's potential use of advertising and analytics services provided by Google Ireland Ltd., users should be aware that a complete explanation of how Google Ireland Ltd. processes the data of website visitors (including data stored in cookies) is available in Google's privacy policy at the following link:

<https://policies.google.com/technologies/partner-sites>.

## **8. FINAL PROVISIONS**

**8.1.** This website may contain links to external websites. The Controller encourages users to review the privacy policies of those websites upon visiting them, as this Privacy Policy applies solely to the Controller's website.

If you have any questions regarding the processing of your personal data or wish to exercise your rights under the General Data Protection Regulation (GDPR), please use the contact form or email our Data Protection Officer at: [iod@worol.pl](mailto:iod@worol.pl).