

DATA PRIVACY AND COOKIES STATEMENT

This Data Privacy and Cookies Statement (hereinafter referred to as: the Data Privacy Statement) contains information about the processing of your personal data and the use of cookies in connection with your use of the website at the following address: <https://247.com.pl/> (hereinafter: the website).

1. Information on the Personal Data Controller

The controller of your personal data is 24/7Communication Sp. z o.o. with its registered office in Warsaw at ul. Świętojerska 5/7, 00-236 Warsaw, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register, under the National Court Register (KRS) number: 0000037818, with the Tax ID (NIP) number: 1181575985, with share capital in the amount of: PLN 50,000, **hereinafter referred to as "Personal Data Controller"**,

2. Contact with the Personal Data Controller

In relation to all matters relating to data protection and this Data Privacy Statement, you can contact the Data Controller:

- **at the following e-mail address,** office@247.com.pl;
- **in writing:** Świętojerska 5/7, 00-236 Warsaw;
- **by phone:** + 48 (22) 279 11 00.

3. Data Protection Officer

The Data Protection Officer appointed by the Data Controller is Ms. Anna Żmijewska, whom you can contact at the following e-mail address: iod@247.com.pl.

4. The purposes and basis for data processing

I WEBSITE USERS' DATA

Purpose of processing	Personal data	Legal basis:
Conclusion of the agreement on the provision of services by electronic means.	<ul style="list-style-type: none">• Data provided by the user when visiting the website.	Art. 6 (1) (b) of the GDPR - the processing is necessary for the performance of an agreement to which the data subject is a party, or for taking action at the request of the data subject prior to entering into an agreement;

Purpose of processing	Personal data	Legal basis:
Contact data and handling correspondence.	<ul style="list-style-type: none">• First name;• Surname;• Position or function;	Art. 6 (1) (f) of the GDPR - the processing is necessary for pursuing a legitimate interest of the

	<ul style="list-style-type: none"> • e-mail address; • phone no.; • company name; • other information on the place of employment; • the content of the correspondence. 	Personal Data Controller, which in this case is to respond to your message addressed to us using the contact details provided on our website.
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Purpose of processing	Personal data	Legal basis:
Verification of your authorisation to represent another entity, e.g. our contractor or customer.	<ul style="list-style-type: none"> • first name and surname; • e-mail address or phone no.; • position or function; • identification data of another entity (i.e. also your place of work, for example) – if you contact us on behalf of other entity; • the content of the correspondence. 	Art. 6 (1) (f) of the GDPR - the processing is necessary for the purposes of the legitimate interest of the Personal Data Controller, in this case is the confirmation of your authorisation to represent the entity on whose behalf you contact us.

Purpose of processing	Personal data	Legal basis:
Handling complaints	<ul style="list-style-type: none"> • name and surname; • email address or phone number; • subject of the complaint; • resolution of the complaint; • other data related to complaint handling. 	Article 6(1)(b) GDPR – processing is necessary for the performance of a contract to which the data subject is party; Article 6(1)(c) GDPR – processing is necessary for compliance with a legal obligation to which the Data Controller is subject.

Purpose of processing	Personal data	Legal basis
Use of cookies – other than cookies necessary for the provision of electronic services.	<ul style="list-style-type: none"> • Personal data contained in cookies according to the user's choice. 	Art. 6 (1) (a) of the GDPR - The processing of personal data in relation to the activities of installing and reading the data from your device takes place on the basis of your consent (when you access the website for the first time, you are asked if you wish to consent to the use of cookies).

Purpose of processing	Personal data	Legal basis
To enable media players and social media plug-ins.	<ul style="list-style-type: none"> Personal data collected by the tools. 	Art. 6 (1) (f) of the GDPR - The processing is necessary for fulfilling the legitimate interest of the Personal Data Controller, which in this case is posting videos embedded in external services (Youtube, Vimeo) and ensuring that they can be played back, as well as ensuring the correct operation of the social media functions (Facebook, Instagram, LinkedIn)

Purpose of processing	Personal data	Legal basis
The analysis of your activity on the website.	<ul style="list-style-type: none"> Age; Gender; Approximate location (e.g. city, country); User language; Data about your behaviour and interaction with the website (e.g. time spent on the website, engagement rate, engaged sessions, ratio of new to returning users, views and views per user, average engagement time); User ID; Data about the technologies used by the users. 	Art. 6 (1) (f) of the GDPR - the processing is necessary for the purposes of the legitimate interest of the Personal Data Controller, which in this case is to learn about your activity on the website.

Purpose of processing	Personal data	Legal basis:
Marketing purposes	<ul style="list-style-type: none"> data of your device (e.g. phone, computer); sites you have visited, and data obtained by cookies, e.g. via social plugins or the Meta Pixel, or Google Ads; interests determined on the basis of activity, e.g. regarding our services. 	Art. 6 (1) (a) of the GDPR - The processing of personal data for targeting with the Meta Pixel is based on your voluntary consent.

Purpose of processing	Personal data	Legal basis:
Archiving and evidentiary purposes.	<ul style="list-style-type: none"> First name; Surname; 	Art. 6 (1) (f) of the GDPR - the processing is necessary for pursuing a legitimate interest of the

	<ul style="list-style-type: none"> • Position or function; • e-mail address; • phone no.; • company name; • other information on the place of employment; • the content of the correspondence. • Other data collected for other purposes. 	<p>Personal Data Controller, which in this case is the safeguarding of information which may serve to prove facts of legal significance.</p> <p>- The display of advertisements to you by means of Google Ads is based on your voluntary consent.</p>
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Purpose of processing	Personal data	Legal basis:
Establishing, investigating, or defending against claims.	<ul style="list-style-type: none"> • First name; • Surname; • Position or function; • e-mail address; • phone no.; • company name; • other information on the place of employment; • the content of the correspondence. • Other data collected for other purposes. 	<p>Art. 6 (1) (f) of the GDPR</p> <p>- the processing is necessary for the purposes of the legitimate interest of the Personal Data Controller, in this case is the protection of the proprietary interest of the Personal Data Controller.</p>

Purpose of processing	Personal data	Legal basis:
Compliance with the obligations under the GDPR	<ul style="list-style-type: none"> • First name; • Surname; • e-mail address; • phone no.; • other indispensable data. 	<p>Art. 6 (1) (c) of the GDPR</p> <p>- the processing constitutes a legal obligation incumbent upon on the Personal Data Controller;</p> <p>Art. 6 (1) (f) of the GDPR</p> <p>- the processing is necessary for pursuing a legitimate interest of the Personal Data Controller, which in this case is, for example, keeping records and registers, as well as having access to information on individuals who have exercised their rights under the GDPR.</p>

II DATA OF CONTACT PERSONS OR REPRESENTATIVES OF THIRD PARTIES (E.G. A CUSTOMER OR A COUNTERPARTY)

Purpose of processing	Personal data	Legal basis:
Contact data and handling correspondence.	<ul style="list-style-type: none"> • first name; • surname; • Position or function; • e-mail address; • phone no.; • company name; • other information on the place of employment; • the content of the correspondence. 	Art. 6 (1) (f) of the GDPR - the processing is necessary for pursuing a legitimate interest of the Personal Data Controller, which in this case is conduct correspondence with you.

Purpose of processing	Personal data	Legal basis:
Verification of your authorisation to represent another entity, e.g. our contractor or customer.	<ul style="list-style-type: none"> • first name and surname; • e-mail address or phone no.; • position or function; • identification data of another entity (i.e. also your place of work, for example) – if you contact us on behalf of other entity; • the content of the correspondence. 	Art. 6 (1) (f) of the GDPR - the processing is necessary for fulfilling the legitimate interest of the Personal Data Controller, which in this case is the confirmation of your authorisation to represent the entity on whose behalf you conduct correspondence with us or conclude an agreement.

Purpose of processing	Personal data	Legal basis:
Taking steps to conclude an agreement on your request.	<ul style="list-style-type: none"> • first name and surname; • e-mail address or phone no.; • position or function; • identification data of another entity (i.e. also your place of work, for example) – if you contact us on behalf of other entity; • the content of the correspondence. 	Art. 6 (1) (b) of the GDPR - the processing is necessary for the performance of an agreement to which the data subject is a party, or for taking action at the request of the data subject prior to entering into an agreement;

Purpose of processing	Personal data	Legal basis:
Fulfilment of tax law obligations	<ul style="list-style-type: none"> • first name; • surname; • e-mail address; 	Article 6(1)(c) of the GDPR in conjunction with the relevant tax law regulations

	<ul style="list-style-type: none"> • phone no.; • position or function; • company, VAT number and other identifying data, e.g. that of the customer or the counterparty; • subject matter of the agreement; • order no.; • the amount of the remuneration; • invoice no.; • date of issue; • payment data; • account no.; • other data included in the invoice; 	- the processing constitutes a legal obligation incumbent upon the Personal Data Controller;
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Purpose of processing	Personal data	Legal basis:
Archiving and evidentiary purposes.	<ul style="list-style-type: none"> • first name; • surname; • e-mail address; • telephone number; • position or function; • company, VAT number and other identifying data, e.g. that of the customer or the counterparty; • the content of the correspondence; • subject matter of the agreement; • order no.; • the amount of the remuneration; • invoice no.; • date of issue; • payment data; • account no.; • other data included in the invoice; • data processed for other purposes. 	Art. 6 (1) (f) of the GDPR - the processing is necessary for pursuing a legitimate interest of the Personal Data Controller, which in this case is the safeguarding of information which may serve to prove facts of legal significance.

Purpose of processing	Personal data	Legal basis:
Establishing, investigating, or defending against claims.	<ul style="list-style-type: none"> • first name; • surname; • e-mail address; 	Art. 6 (1) (f) of the GDPR - the processing is necessary for the purposes of the legitimate interest of

	<ul style="list-style-type: none"> • telephone number; • position or function; • company, VAT number and other identifying data, e.g. that of the customer or the counterparty; • the content of the correspondence; • subject matter of the agreement; • order no.; • the amount of the remuneration; • invoice no.; • date of issue; • payment data; • account no.; • other data included in the invoice; • data processed for other purposes. 	the Personal Data Controller, in this case is the protection of the proprietary interest of the Personal Data Controller.
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Purpose of processing	Personal data	Legal basis:
Compliance with the obligations under the GDPR	<ul style="list-style-type: none"> • First name; • Surname; • e-mail address; • phone no.; • other indispensable data. 	<p>Art. 6 (1) (c) of the GDPR</p> <p>- the processing constitutes a legal obligation incumbent upon the Personal Data Controller;</p> <p>Art. 6 (1) (f) of the GDPR</p> <p>- the processing is necessary for pursuing a legitimate interest of the Personal Data Controller, which in this case is, for example, keeping records and registers, as well as having access to information on individuals who have exercised their rights under the GDPR.</p>

5. The obligation to provide us with your personal data

- You are obliged to provide your personal data in case they are processed by the Personal Data Controller in order to fulfil his/her obligations resulting from the legal regulations, i.e.:
 - To fulfil the obligations under tax law.
 - To fulfil the obligations under the GDPR
- The provision of personal data in other cases is voluntary and depends on your decision, but may be necessary for specific purposes, e.g. conclusion of an agreement, conducting correspondence with you.

6. Source of data

The Personal Data Controller has obtained your personal data directly from you, from the entity you represent, from the entity on whose behalf you contact us or from publicly available sources.

7. Right to withdraw consent

- If the processing of your personal data is based on your consent, you may withdraw your consent at any time, at your own discretion.
- If you would like to withdraw your consent to the processing of your personal data, to do so, it is sufficient to send an email directly to the Personal Data Controller at: iod@247.com.pl or in the case of cookies, including those using personal data for remarketing purposes, by changing the [cookie settings](#).
- If the processing of your personal data was based on your consent, its withdrawal does not make the processing of your personal data illegal until that moment. In other words, until your consent is revoked, we have the right to process your personal data, and revoking your consent does not affect the lawfulness of processing up to that date.

8. Data profiling and automated decision-making

We would like to inform you that your data will be used by us for profiling in connection with the Personal Data Controller's use of remarketing tools, including Meta Pixel.

This allows the Personal Data Controller to target you with personalised advertisements based on your previous activities on the website, which constitutes the so-called "behavioural advertising". You can find detailed information on behavioural advertising, including how to manage your settings at: <https://www.youronlinechoices.com/>.

9. Personal data recipients

Like most entrepreneurs, in our business activity we use the assistance of other entities, which often involves the need to transfer personal data. Therefore, we may pass your data to external service providers if necessary.

External service providers who are involved in the processing of your personal data are as follows:

- **Hosting companies** that store your data on a server,
- **Technical service providers**, if technical work is included in the operation of the areas where your personal data are stored, e.g. an IT services provider.
- **The cloud computing provider** in which the files containing your personal data are stored;
- **Providers of tools or plug-ins** that are used by the Personal Data Controller;
- **Entities from the area of legal services**, who are subject to professional secrecy obligation and access personal data as a result of a legal necessity,
- **Other subcontractors** who will access the data if necessary.

In addition, we may for example have to pass on your personal data to other entities, whether public or private, on the basis of the applicable law or a decision of a competent authority. For our part, we assure you that we analyse all requests for personal data very carefully and thoroughly so as not to inadvertently pass on the information to an unauthorised person.

10. Transfer of personal data to third countries

Yes. In connection with the Personal Data Controller's use of external tools such as the Meta Pixel, your personal data may be transferred e.g. to the USA. The legal basis for the transfer of personal data to the USA is a decision of the European Commission number 10 July 2023 stating an adequate level of protection for personal data provided by the so-called "EU-US Data Privacy Framework". The data transfer is carried out by the tool provider.

Information for Individuals Contacting or Representing a Client or Contractor

We kindly inform you that we may transfer your data outside the European Economic Area or to an international organization, for example in connection with our cooperation with various entities.

We ensure that any such data transfers will be made to countries for which the European Commission has issued a decision confirming an adequate level of personal data protection or will be carried out in compliance with all legal requirements, including on the basis of an appropriate agreement incorporating data protection clauses adopted by the European Commission, thereby ensuring an adequate level of protection for the transferred personal data.

You have the right to obtain a copy of these safeguards at any time.

11. Period of storage of personal data

Please note that we do not process your personal data "indefinitely", but for the time necessary to achieve the stated purpose, in accordance with the applicable legal provisions. After this period your personal data will be irretrievably deleted or destroyed.

A description of the processing periods can be found below:

- **Conclusion and performance of an agreement** – data necessary for the conclusion and performance of an agreement will be stored until the agreement has been performed;
- **Contact and handling correspondence** - data related to handling correspondence will be processed for the duration of the correspondence between us;
- **Handling of complaints** – the data will be processed until the complaint handling process is completed;
- **Marketing purposes** – data processed for marketing purposes will be processed until an objection has been successfully made or the purpose of the processing has been achieved – in the case of data processed on the basis of a legitimate interest, and until a consent has been withdrawn or the purpose of the processing has been achieved – in the case of data used for profiling,
- **Use of cookies (other than the cookies necessary for the provision of electronic services) in relation to the activities of recording and reading data from a device** – data related to cookies will be processed until a consent has been withdrawn or the purpose of the processing has been achieved,
- **Analysis of website activity** – data related to website activity analysis will be processed until they have become obsolete or no longer relevant.
- **Archival and evidentiary purposes** – data related to archival and evidentiary purposes will be processed until you have effectively objected to the processing, or the purposes of the processing have been achieved,
- **Establishment, investigation, and defence against claims** – data related to claims will be processed until the expiry of the limitation period for claims, whereby the limitation period for claims may vary in light of applicable legal provisions;
- **Fulfilment of obligations under the GDPR** – data related to data protection will be processed until they are no longer fit for purpose, you have effectively objected to the processing or until the expiry of the limitation period in relation to our liability as the Data Controller.

- **Fulfilment of tax law obligations** – data related to the requirement to fulfil tax obligations binding upon the Personal Data Controller will be stored for the period specified in the legal regulations, i.e. 5 years calculated from the end of the tax year in which fulfilment of the tax obligation became due,

12. Rights in relation to the processing of your personal data

We would like to inform you that under the GDPR you have the right to:

- access your personal data;
- rectify your personal data;
- delete your personal data;
- limit the processing of your personal data;
- object to the processing of your personal data;
- transfer your personal data.
- lodge a complaint with a supervisory authority (if you find that we are processing your data unlawfully, you may lodge a complaint to this effect with the President of the Office for Personal Data Protection or any other competent supervisory authority).

As the Personal Data Controller, we respect your rights under data protection laws, and we try to facilitate their implementation as much as possible. We point out that the above-mentioned rights are not absolute and therefore in some situations we may legally refuse to fulfil them. However, if we refuse to accept a request, it is only after a careful analysis and only if such a refusal is necessary.

13. Cookies

The Personal Data Controller on its website, similarly to other entities, uses the so-called cookies on its website, i.e. short text information saved on a computer, phone, tablet, or another website user's device. They can be read by our system, as well as by systems belonging to other entities whose services we use. We use cookies on the basis of your consent, except where cookies are necessary for the provision of services by electronic means.

Cookies that are not necessary for the provision of services by electronic means remain blocked until you have given your consent to their use. When you visit the website for the first time, we display a message asking for your consent together with the possibility to manage cookies, i.e. to decide which cookies you agree to and which you want to block.

Cookies perform many functions on the website, most often useful, which we will try to describe below.

- **service cookies** – used to provide electronic services; they are necessary for the operation of the website and cannot be disabled, e.g. Cookiebot;;
- **functional cookies** – to remember your preferences and adapt the website to your needs;
- **analytical cookies** - they are used to analyse how users use the website (how many open the website, how long they stay on it, which content arouses most interest, etc.). This enables constant improvement of the website and adaptation of its operation to users' preferences. We use Google tools such as Google Analytics to track activity and produce statistics,
- **marketing cookies** – to target behavioural advertising to you;
- **social media cookies** – used for the proper operation of social plug-ins or media players
- **session cookies** – stored in the memory of your browser until you close it;
- **permanent cookies** – they remain in the memory of your browser for the duration of their validity or

until you delete them. They facilitate navigation on the website.

The Personal Data Controller uses his/her own cookies for the smooth operation of the website and third-party cookies detailed in the "Tools" section.

You can modify your cookies from our website. You can use this link <https://247.com.pl/en/#ustawienia-cookies> to modify your cookies.

In addition, you can manage your privacy using the following solutions (among others):

- blocking cookies within the framework of the web browser used. You can block all or selected cookies, including those relating to specific sites. You can delete already stored cookies and other data from plug-ins and sites,
- when using incognito mode, the cookies are deleted as soon as you close the window,
- by using plug-ins that provide control over cookies, such as <https://www.ghostery.com/>.

14. Tools

The Personal Data Controller uses the following tools:

- Google Analytics;
- Meta Pixel;
- Youtube;
- Vimeo;

Google Analytics

The provider of the tool for the Personal Data Controller is Google Ireland Limited, a company registered and operating under the laws of Ireland (Registration number: 368047 / VAT no: IE6388047V) Gordon House, Barrow Street, Dublin 4, Ireland. The use of the tool by the Personal Data Controller is done by inserting a tracking code into the website.

You can block the tool using the solution provided by Google <https://tools.google.com/dlpage/gaoptout>. You can find detailed information on how Google uses the information collected from websites and applications here <https://policies.google.com/technologies/partner-sites>.

Google Ads

The provider of the tool to the Personal Data Controller is Google Ireland Limited, a company registered and operating under the laws of Ireland (Registration number: 368047 / VAT number: IE6388047V) Gordon House, Barrow Street, Dublin 4, Ireland. The tool is used by the Personal Data Controller by plugging a tracking code into the website. Based on the collected data about your activity on the website, Google will display advertisements for our services. The Personal Data Controller only defines the group of recipients and does not identify individuals. You can manage your privacy using these settings: <https://myadcenter.google.com/personalizationoff?n=true>. Detailed information about the processing of your personal data by Google can be found here: <https://policies.google.com/technologies/partner-sites>.

Meta Pixel

In accordance with the EDPB (European Data Protection Board) guidelines of 13 April 2021 No. 8/2020 on the targeting of social media users – the tool provider and the Personal Data Controller are joint controllers of the

users' personal data with regards to the collection of personal data and data transmission through the tool, as well as with regard to the matching and subsequent display of the advertisement to the user on the social media platform. You can find detailed information about the rules of Facebook.com on the processing of personal data here: https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0.

The tool is used for behavioural advertising; you can find more information on this advertising in the section "Data profiling and automated decision-making."

Youtube

The provider of the tool for the Personal Data Controller is Google Ireland Limited, a company registered and operating under the laws of Ireland (Registration number: 368047 / VAT no: IE6388047V) Gordon House, Barrow Street, Dublin 4, Ireland. When you play a video embedded in a website, Youtube cookies are installed on your device. If you play the video while logged into your Google account, the provider will be able to associate your activity with the account. To avoid this, log out of your Google account before playing the video. You can also prevent the upload of plug-ins by configuring your browser accordingly, e.g. by blocking scripts. The details of the processing of data by the tool provider can be found here: <https://policies.google.com/privacy?hl=pl>.

Vimeo:

The provider of the Vimeo tool is Vimeo.com, Inc. When you play a video embedded in a website, Vimeo cookies are installed on your device. You can prevent the upload of plug-ins by configuring your browser accordingly, e.g. by blocking scripts. The details of the processing of data by the tool provider can be found here: <https://vimeo.com/privacy>, https://vimeo.com/cookie_policy.

15. Types of cookies placed

Name	Vendor	Expiry date	Function
AEC	Google Ads Optimization		
APISID	Google Ads Optimization		Unknown
DSID	Google DoubleClick		Marketing
HSID	Google Ads Optimization		Functional
IDE	Google Ads Optimization		
NID	Google Ads Optimization		Marketing
OTZ	Google Ads Optimization		
S	Google Ads Optimization		
SAPISID	Google Ads Optimization		
SID	Google Ads Optimization		Marketing
SIDCC	Google Maps		Functional
SOCS	Unknown		Unknown
SSID	Google Ads Optimization		Unknown
UULE	www.google.com		Unknown
__Secure-1PAPISID	.google.com		Advertising
__Secure-1PSID	.google.com		Advertising
__Secure-1PSIDCC	.google.com		Advertising
__Secure-	.google.com		Advertising

1PSIDTS			
__Secure-3PAPISID	.google.com		Advertising
__Secure-3PSID	.google.com		Advertising
__Secure-3PSIDCC	.google.com		Advertising
__Secure-3PSIDTS	.google.com		Advertising
_fbp	Facebook		Advertising
_ga	Google Analytics		Analytical
_ga_6V7JD5MPF7	Google Analytics		Analytical
_gcl_au	Google Adsense		Analytical
ar_debug	Google		Analytical
ar_debug	Google		Analytical
c_user	.facebook.com		Advertising
cookie-consent	247.com.pl		Indispensable
datr	.facebook.com		Functional
fr	.facebook.com		Advertising
presence	.facebook.com		Functional
sb	.facebook.com		Advertising
usida	unknown		unknown
wd	.facebook.com		Functional
wp-wpml_current_language	247.com.pl		Indispensable

16. Server logs

In connection with the use of the website, every request made to the website is recorded in the logs of the server on which the website is hosted. The following information is recorded in the logs (among other things): the IP address, the date and time of the server, information about the operating system and the browser you are using. The Personal Data Controller does not use this information to identify you. The server logs are a tool for the administration of the website, and they are only accessed by persons whose knowledge is necessary to perform their duties on behalf of the Personal Data Controller.

17. Updating the Privacy Statement

We may modify the Privacy Statement, in particular due to changes in technology and changes in applicable law. You will be notified of any amendments to this Privacy Statement in a way appropriate to the manner in which your data are processed. This Data Privacy Statement is effective as of 6th May 2024 and moreover any archival versions of the Data Privacy Statement will be linked below.

https://247.com.pl/app/uploads/2024/09/06-05-2024_privacy-policy.pdf

https://247.com.pl/app/uploads/2023/07/2023_02_14_polityka-prywatnosci.pdf