

WEBSITE PRIVACY POLICY

Who we are

The [insteadagency.com](https://www.insteadagency.com) website (“**Website**”) is operated by Grupa 3 Spółka z Ograniczoną Odpowiedzialnością Agencja Reklamowa sp.k. (“**Grupa 3**”), a limited partnership located in Poland. ‘Instead Agency’ is a brand of Grupa 3. The aim of our Website is to enable you to contact us and get to know the range of services we offer and our portfolio.

Below you will find our business details as required by law:

Full legal name:	Grupa 3 Spółka z Ograniczoną Odpowiedzialnością Agencja Reklamowa spółka komandytowa
Address of the head office:	ul. Murarska 3, 31-311 Kraków, Poland
Tax ID Number (NIP) / EU VAT ID:	6772355485 / PL 6772355485
National Court Register Number (KRS):	0000595708
Registry Court:	District Court for Kraków-Śródmieście in Kraków, 11th Economic Division of the National Court Register (Sąd Rejonowy dla Krakowa-Śródmieścia w Krakowie, XI Wydział Gospodarczy Krajowego Rejestru Sądowego)

How to contact us:

- via **e-mail**: hello@insteadagency.com
- via the **contact form** on our Website
- via **traditional mail**.

PERSONAL DATA

Grupa 3 respects your right to privacy. We act in accordance with applicable data privacy laws of the European Union and Poland. The principles set out in this Privacy Policy are applicable to all situations in which Grupa 3 receives personal data which you provide on the Website, particularly on the contact form or via chat.

Please be informed that:

[Data controller]

- Grupa 3 is the data controller of personal data that you provide on our Website.

[The purposes of processing and the legal basis for the processing. Legitimate interest]

- Any personal data which you provide on the contact form or via chat on the Website will solely be processed for the purpose of contacting you and – if applicable (i.e. if you ask us to send you our offer) – informing you of the services we offer. If you contact us via the contact form or chat, the legal basis for the processing of your personal data is our legitimate interest (as set out in Article 6(1) point (f) of the General Data Protection Regulation¹) in answering your enquiry and – if applicable – entering into a business relationship with you.
- Your activity on our Website, including your personal data such as your IP address, is stored in system logs (special software for the storage of chronological records that include information on events and activity occurring on the IT system used for running our Website). The information collected in the logs are primarily processed for technical, administrative, system security and

¹ 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).

system management purposes, as well as for analytical and statistical purposes – within this scope, the basis for data processing is our legitimate interest (article 6 (1) point (f) of the General Data Protection Regulation) in providing correct and secure performance of the Website and the creation of analyses and statistics for the improvement of the Website and our business offer .

- If you visit our Website and have agreed to the use of cookies, we process your personal data carried by cookies (such as IP address or cookie IDs) based on our legitimate interest (as set out in Article 6(1) point (f) of the GDPR) in delivering Internet advertisements of our services that might be of particular interest (e.g. basing on the content that you have browsed, which includes so-called profiling) to you and tracking the effectiveness of our ad campaigns.
- Upon your consent (article 6 (1) point (a) of the General Data Protection Regulation) we can also process your personal data for other purposes. You may withdraw the consent you provide at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

[Recipients of personal data]

- The Recipients of your personal data are the entities, that provide us with IT (e.g. hosting, e-mail), analytic or marketing solutions (e.g. Google).
- We also use Smartsupp on our Website. Smartsupp is a live chat solution developed and operated by Smarstupp.com, s.r.o. (Milady Horakove 13, 602 00 Brno, Czech Republic). Smartsupp's privacy policy is available on <https://www.smartsupp.com/privacy>.

[Transfer to a third country – out of the EEA]

Data protection level outside the European Economic Area differs from the one required by European law. We transfer personal data out of the EEA only when adequate level of protection is provided and according to the General Data Protection Regulation. For some processes within Website we use services (analytical, internet advertising) provided by the entities located in the USA (e.g. Google). As a result, personal data (such as e.g. an IP address or cookie ID number) may be transferred out of the EEA to the necessary extent. Data is transferred to the USA according to the Privacy Shield Framework. Based on the decision of the European Commission concerning the Privacy Shield, USA is recognised the country providing adequate level of personal data protection (comparing to the level of protection in the EEA) in case of entities listed in the Privacy Shield Framework.

[The period for which the personal data will be stored]

- We will store the personal data that you provide on the contact form or via chat for a period which is necessary to communicate with you. The envisaged period for which the personal data will be stored is no longer than 6 months from the moment of cessation of communication with you.
- Data collected on the basis of our legitimate interest are stored until our interest has expired, unless you raise an effective objection earlier.
- Data collected based on your consent is stored until the withdrawal of your consent.

[Your rights]

- If you provide us with your personal data, you have the right to request from us access to and rectification or erasure of your personal data or restriction of processing concerning your data, or to object to processing, as well as the right to data portability (i.e. the right to receive the personal data concerning you which you have provided to us, in a structured commonly used and machine-readable format, and have the right to transmit those data to another controller, where the processing is based on consent, pursuant to point (a) of Article 6(1) of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6(1), and the processing is carried out by automated means).
- You have the right to object at any time to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such marketing. If you object to processing for direct marketing, your personal data shall no longer be processed for such purposes.

- Where the processing is based on your consent, you have the right to withdraw the consent you provide at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- If you think that the processing of your personal data by us is breaking the personal data protection law you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement (in Poland with the Head of the Data Protection Office/Prezes Urzędu Ochrony Danych Osobowych).

[Are you obliged to provide your personal data?]

- You are not required to provide us with any data which may allow us to identify you. Any personal data you provide is provided on a voluntary basis. If you want to use the contact form on our Website, you will need to give some of your personal data (contact details such as your name and e-mail address), or otherwise we will not be able to contact you.

[Other information]

Grupa 3 uses security measures in line with data protection regulations to prevent data loss, to preserve data integrity and to prevent illegal access to the data. In order to secure your personal data, we use cryptographic protocol on the Website.

COOKIES

We make use of cookies. Cookies are special sets of data (small files) that are sent to the user's browser from the web server and are stored there for later recall or – depending on the cookie and its duration – are stored only for the duration of the user's visit to the Website.

Cookies are widely used on various websites in order to make them work efficiently and to remember information such as display preferences or font size, or if the visitor has previously replied to a pop-up. Cookies do not contain the user's name or contact data, but – typically – only an IP or ID number which is not intended to determine a person's identity. In some cases, when the user's session on a website has ended, the information contained in the cookies is no longer available for the owner of a website.

The cookies we use are functionality cookies, analytical cookies, advertising cookies and social media cookies as well as chat cookies. We use both session cookies and persistent cookies. Our Website uses own cookies and third-party cookies (please see in particular the section on "Google Analytics and remarketing").

With our trusted partners, we use cookies for marketing purposes, such as for behavioural advertising, which means advertising based on browsed content. For this purpose, jointly with our trusted partners, we store information or gain access to information stored on the end user's device (such as a personal computer, smartphone, tablet etc.). We use cookies, and personal data collected through them, for the purposes of marketing our services as part of internet advertising. Insofar as this involves processing your personal data, the basis for processing is our legitimate interest (article 6 (1) point (f) of the General Data Protection Regulation), which is the promotion (direct marketing) of our services in connection with your consent for the use of marketing cookies.

We use our own cookies for statistical purposes and to:

- remember your display references or font size,
- check if you have seen the cookies banner and if you have agreed (or not) to our use of cookies on the Website, analyse traffic patterns,
- improve the Website content,
- collect information about how you access the Website.

Enabling our cookies is not strictly necessary for our Website to work, but will provide you with a better browsing experience. You can delete or block these cookies, but please be informed that some Website functionality may not work as intended in the case of visitors who do not consent to the use of cookies on the Website.

[Cookie consent]

Your prior consent is required for us to store any type of cookies in your browser (on your device). You can give your consent i.a. through your browser settings. If your browser settings allow the use of cookies from our Website, this means that you consent to the use and storage of the cookies. You can prevent the use of cookies in general if you disallow the storage of cookies in your browser. Depending on the browser that you use, you may also set your browser to 'block' particular cookies and to allow the use of other cookies. For detailed information on how to enable or disable cookies in your browser, please refer to your browser developer or user manual.

You may refuse the use of cookies by selecting the appropriate settings on your browser (please see the section "Cookie consent" above).

[Google Analytics and remarketing]

We use a Google Analytics tool on our Website. This helps us improve our Website. Google Analytics services are provided to us by Google. Google uses its own cookies on our Website to provide services for us.

Google Analytics helps us analyse how visitors use our Website. The information generated by Google Analytics cookies is – generally – transmitted to and stored by Google in the United States. We have activated IP anonymisation, which means that IP addresses of Google users from the European Union or EEA member states are shortened. Google uses the information generated by its cookies for the purpose of evaluating our Website, in order to compile reports on the Website, for statistical purposes, and to provide us with other services relating to the Website activity.

Google Analytics cookies can be disabled through your browser settings. Collecting and processing cookies data by Google Analytics can also be blocked by downloading and installing a browser plug in, available at the following link: <https://tools.google.com/dlpage/gaoptout/>. For more information on Google Analytics visit the following link: <https://support.google.com/analytics/answer/6004245?hl=en> and Google's own privacy policy: www.google.com/policies/privacy/partners/.

We also use Google Analytics remarketing technology on our Website. This feature allows us to track visitors who come to our Website in order to show them our advertisements within the Google advertising network, based on the content which visitors have previously accessed on other websites within the Google advertising network. The Google Analytics remarketing feature uses its own cookies. These cookies collect information that, based on your prior use of our Website, may be used to target our advertisements to you when you visit other websites within the Google network. The advertisements may take the form, for example, of an advertisement on the Google search results page or on a site which cooperates with Google. You can disable the remarketing feature in a number of ways, for instance by adjusting the appropriate Google settings (<https://adssettings.google.com/>).

You can also find additional information about the collection and use of data by Google under <http://www.google.com/policies/privacy/>.

[Contact]

If you have any requests concerning your personal data or any inquiries with regard to your personal data or this Privacy Policy, please contact Grupa 3 using the contact methods listed in this Privacy Policy (section: "Who we are").