Privacy policy describes the rules concerning our information processed on Clients, including personal data and so-called cookies.

1. General information

- 1. Our policy applies to the website operating at the url: **itbility.pl**
- 2. The Operator of the website and Administrator of personal data is: ITbility.pl Ltd. Piękna st. 15/13, Warsaw
- 3. Operator's e-mail contact address is: kontakt@itbility
- 4. The Operator is the Administrator of your personal data provided voluntarily on the website
 - 5. The Website uses personal data for the following purposes:
 - a. Handling inquiries sent in by forms
 - b. Implementation of ordered services
 - c. Offer or information presentation
 - 6. The service implements functions of obtaining information about users and their behavior in the following way:
 - a. By data given voluntarily in forms, which are entered into the Operator's system
 - b. By entering cookie files in the final devices (so-called cookies)

2. Selected data protection methods used by Operator

- 1. Login and entering personal data locations are protected in transmission layer (SSL certificate). Thanks to this, personal data and login data, entered on the website are encripted on the user's computer and can only be read on the target server
 - 2. The website uses two-factor Authentication, which is an additional form of protection when logging into the website
 - 3. Administrative passwords are periodically changed by Operator
 - 4. In order to protect data, backup copies are regularly made by Operator.
- 5. An important element of data protection is regular updating of all software, used by Operator in personal data processing, which in particular, means regular updating of programming components.

3. Hosting

- 1. The service is hosted (technically maintained) on Operator's servers: OVH
- 2. In order to ensure technical reliability, the hosting company runs logs at the server level. The following may be subject to registration:
- a. resources specified by URL identifier (addresses of requested resources pages, files),
- b. arrival time of request,
- c. response time
- d. client's station name identification carried out by HTTP protocol
- e. information on errors occurred during HTTP transaction implementation
- f. URL address of page previously visited by user (so-called referrer link) when transition to website was made by a link
- g. Information on browser used
- h. IP address information
- i. diagnostic information related to the process of self-ordering services via the registers on the website
- j. information on e-mail service directed to Operator and sent by Operator

4. Your rights and additional information on how your data is used

- 1. In some situations, Administrator has the right to transfer your personal data to other recipients provided it is necessary to realise contract requirements concluded with you or to fulfill the obligations incumbent on Administrator. This applies to following groups of recipients:
- a. hosting company on entrustment basis
- b. authorized employees and associates who use the data to achieve the purpose of website activities.
- c. companies providing marketing services to Administrator
- 2. Your personal data will be processed by Administrator for no longer than necessary to perform activities related to them, specified in separate regulations (e.g. on accounting). In relation to marketing data, the data will not be processed for longer than 3 years.

- 3. You have the right to request from Administrator:
- a. access to personal data concerning you,
- b. error corrections,
- c. removals,
- d. processing restrictions,
- e. and data transfer.
- 4. You have the right to object to data processing indicated in point 3.2 concerning processing of personal data for the purpose of pursuing legally justified interests wanted by Administrator, including profiling, however, the right to object cannot be exercised if there are important legally justified grounds for processing, overriding interests, rights and freedoms towards you, in particular, arrangements, investigatios, or defence of claims.
- 5. You may file a complaint regarding the Administrator's actions to the President of Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.
- 6. Providing personal data is voluntary, but necessary to operate the website.
- 7. You may be subject to automated decision-making, including profiling, for the purpose of providing services under the concluded contract and for the purpose of conducting direct marketing by the Administrator.
- 8. Personal data may not transferred to third countries due to regulations on personal data protection, which means that we do not send it outside European Union.

5. Information in forms

- 1. Website collects information provided voluntarily by user, including personal data, if given.
- 2. Service may save information about connection parameters (time stamp, IP address).
- 3. In some cases, the service may save information that facilitates linking the data in the form with the email address of the user filling out the form. In such a case, the user's email address appears inside the URL of the page containing the form.
- 4. The data provided in the form are processed for the purpose resulting from the function of a specific form, e.g. to complete the service process, service request or sales contact, service registration, etc. Each time, the context and description of the form clearly informs what it is used for.

6. Administrator Logs

1. Information about user behavior may be subject to logging. This data is used to administer the service.

7. Important Marketing Techniques

- 1. The Operator uses statistical analysis of website traffic through Google Analytics (Google Inc. based in USA). The Operator does not transfer personal data to the Operator of this service but only anonymized information. The service is based on use of cookies on user's end device. In terms of information about user preferences collected by the Google advertising network, user can view and edit information resulting from cookies using the tool: https://www.google.com/ads/preferences/.
- 2. The operator uses Facebook pixel. This technology means that Facebook (Facebook Inc. based in the USA) knows that a given person registered in it uses the service. In this case, it relies on data for which it is the administrator itself. The Operator does not transfer any additional personal data to Facebook. The service is based on the use of cookies in the user's end device.
- 3. The Operator uses a solution that examines users behavior by creating heat maps and recording behavior on the site. This information is anonymized before it is sent to Service Operator so that it does not know which person it concerns. In particular, entered passwords and other personal data are not subject to recording.

8. Information about cookies

- 1. The website uses cookies
- 2. Cookies are computer data, in particular text files, which are stored in the end device of the Service User and are intended to be used on Service's websites. Cookies usually contain the name of the website from which they originate, time of their storage on the end device and their unique number.
- 3. The entity that places cookies on end device of Website User and obtains access to them is Website Operator.
- 4. Cookies are used for following purposes:
- a. maintaining Service User's session (after logging in), thanks to which the user does not have to re-enter their login and password on each Service subpage.
- b. achieving goals set out above in section "important marketing techniques"
- 5. Service uses two basic types of cookies: session cookies and persistent cookies. Session cookies are temporary files that are stored on user's end device until logging out, leaving the website or disabling the software (internet browser). Persistent cookies are stored on User's end device for the time specified in cookie parameters or until they are deleted by User.

- 6. Software for browsing websites (internet browser) usually allows cookies to be stored on the user's end device by default. Service users can change the settings concerning it. The internet browser allows to delete and perform automatic file blocking. Detailed information on it can be found in section help or documentation of the internet browser.
- 7. Limitations on use of cookies may affect some of the functionalities available on website.
- 8. Cookies placed on end device of Service User may also be used by entities cooperating with Website Operator, in particular the following companies: Google (Google Inc. with its registered office in the USA), Facebook (Facebook Inc. with its registered office in the USA, Twitter (Twitter Inc. with its registered office in the USA).
- 9. Cookie management how to agree or withdraw consent in practice?
 - 1. If the user does not want to receive cookies, they can change their browser settings. We should like to inform that disabling support of cookies necessary for authentication processes, security, and maintaining User preferences may make it difficult, and in extreme cases, may even prevent using www pages.
- 2. in order to set cookies, select the web browser you are using from the list below and follow the instructions:
- Edge
- Internet Explorer
- Chrome
- Safari
- Firefox
- -Opera

Mobile devices:

- Android
- Safari (iOS)
- Windows Phone