

Entities from the Ringier Axel Springer Polska Group respect the right to privacy of Users of our services and guarantee the Users' right to choose to share information that concerns them. We make every effort to ensure that personal data of our Users are subject to processing in accordance with applicable provisions of Polish and EU law.

- Our Privacy Policy informs how we process personal data of Users of our services (websites, apps), including, in particular:
- who is the controller of your personal data,
- what kind of personal data are processed and whether the processing of such data is necessary in light of services we perform by electronic means,
- for what purpose and on what ground data are processed,
- for how long data will be processed,
- what rights are afforded to our Users as data subjects,
- who data are made available to

Personal Data Controller

The Controller of your personal data is an entity from the Ringier Axel Springer Polska Group, whose website or app you're using. The name of the Controller can be found at the bottom of a website or in an app, it's also shown in the Controller's logo on the website or in the app. Controllers of your personal data are also other entities from the Ringier Axel Springer Polska Group. Details of entities from the Ringier Axel Springer Polska Group can be checked via this [link](#). [entities from the Ringier Axel Springer Polska Group]

What does this mean? An entity from the Ringier Axel Springer Polska Group – service provider of a given website or app – will make a decision concerning the purpose and manner of processing of your personal data, i.e. on how your data will be processed.

How to contact us concerning personal data?

Go to the “Contact” tab where you will find a [form](#) for submitting requests concerning your personal data processing rights. We've appointed Aleksander Gacek as the **Data Protection Officer** (DPO) for Ringier Axel Springer Polska Group entities. DPO is a person you may contact in all matters related to the processing of your personal data and the exercise of your processing rights, at:

e-mail: IOD@ringieraxelspringer.pl

address: ul. Domaniewska 49, 02-672 Warszawa, with a note “Data Protection Officer”

What kind of data do we process?

We process your data concerning information about visited websites and internet applications, information (including information about the content presented within these websites and applications) saved in cookies and cache on your device as well as location data generated by your device (together with automated analysis of your activity on websites and in apps). You provide us with your personal data that are necessary for the provision of services, for example when you create an account or a profile on a website, when you fill in a form or registration windows in services, when you install apps, when you change data in the process

of editing your account (such as e-mail address, name and surname, age, sex, city, date of birth).

We also process data collected during your activity in the services – on the websites and in apps, in particular visited locations and places, time of visit at a given location, your clicks, manner of using services (e.g. purchase history, VOD.pl product searches), information about terminal equipment or browser, including its location. The processing of the data referred to above, saved in cookies and cache on your device (including data provided in browsing history and data collected during your activity in the services), as well as location data generated by your device is necessary in light of the nature of services that we perform by electronic means, involving the sharing of content on our websites, services, apps or similar web-based tools.

By rendering hosting services, we store on our servers data that you publish on your own and voluntarily via provided IT tools in the Internet, in specific services.

The scope of processing of particular data varies from one service to another – detailed information is provided for each service in the course of registration process or in terms of use for a given service.

For what purpose and on what ground are data processed?

- **If we enter into a service performance contract with you** (for example, a service providing you with the opportunity to get acquainted with one of our services based on the terms of use for this service), we may process your data in the scope necessary for the **performance of this contract**. When you create an e-mail account, a contract supplying you with this account authorizes us to process data necessary for supplying this account (for example, data provided by you in the account profile). Without this, we would be unable to provide the service to you, and you would be unable to make use of it. Failure to provide such data will prevent us from executing and performing the contract.
- **In order to ensure security of a service** (for example, checking if your account is not accessed by an unauthorized person), performing **statistical measurements, improving our services and customizing them to the needs and convenience of users** (for example, customizing content in services) as well as for the purpose of **direct marketing** (also at advertisers' requests) or **promotion of our own services** (for example, if you're interested in history and watch content concerning history on the Onet website or other websites, we may show an ad for an article about historical trails on the Onet Podróże website). For marketing and statistical purposes related to better alignment of advertising and editorial content, your data may be processed also by means of creating comparisons and compilations with data of other users (including data concerning activity on our services, for example browsing of services concerning a given topic) and by analysis of such comparisons and compilations. For marketing purposes and for purposes of adjustment of the content of our services we may also analyze which have been launched or presented on the websites/applications you have visited together with the method of launch or presentation thereof (for example if we notice that many users scroll the screen down in order to see particular content we will try to put it in more visible place and in case a particular advertise has been presented for you we may select other corresponding advertises).

Such processing constitutes a **performance of our legitimate interests**.

- **In order to perform marketing services provided to you by our Trusted Partners and by us for the benefit of third parties.** In order to show you advertisements you're interested in (for example, a product you might need), advertisers and their representatives would like to process your data saved in cookies and cache on your device (including data provided in browsing history and data collected during your activity in the services), as well as location data generated by your device (together with automated analysis of your activity on the websites and in apps in order to specify your potential interests for the purposes of **advertisement alignment**). Such data are processed on the basis of your voluntary consent, and in the case of certain Partners – on the basis of legitimate interest of the controller. Granting of such consent is voluntary and you are not obliged to provide it, it will not prevent you from accessing our services. You are also able to restrict the scope of processing or change (withdraw) consent at any time. In the event the processing of aforementioned data is based on legitimate interest of the controller, you may object to such processing. Management of consents as well as submitting or withdrawing objections may be done by means of a tool that we provide, operating on the basis of a solution provided by an industry organization - Związek Pracodawców Branży Internetowej IAB (Interactive Advertising Bureau) – you may access it at the bottom of this page (“Change your privacy settings” button).

Your data will also be processed if required by provisions of law, for example for tax or accounting reasons.

For how long will data be processed?

Your data will be processed until there is a ground for processing them, i.e.:

- in the event a consent is granted until it is withdrawn, restricted or until you have taken other steps limiting such consent,
- if data are necessary for performing a contract, in the period when such contract is being performed and until claims under the contract have become time-barred (3 or 6 years); in the event of a 6 year period, it will be – pursuant to Article 118 of the Civil Code – extended by the end of the calendar year in which the 6-year period expires (for example, if the 6-year period expires on 1st May of a given year, the claim will become time-barred only after 31st December of such year). Start of the period is counted from the day when the claim has become due,
- where data processing is based on legitimate interest of the controller, until you have submitted an effective objection,
- for tax and accounting reasons, in the scope and for the period in accordance with applicable provisions.

What rights are afforded to our Users as data subjects?

In accordance with provisions of the General Data Protection Regulation (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 (**GDPR**), you are afforded the following rights

related to the processing of your personal data by us, by other entities from the Ringier Axel Springer Polska Group and by Trusted Partners:

- **right to access your data, including to obtain a copy of them,**
- **right to demand rectification of data**
- **right to data erasure** (right to be forgotten),
- **right to lodge a complaint with a supervisory authority**, being the President of the Personal Data Protection Office in Poland,
- **right to restriction of processing.**
- **right to object** (objection to processing, direct marketing, including profiling, a justified objection to processing based on legitimate interest of the controller). We have carried out balance tests regarding the processing of personal data based on our legitimate interest referred to above. Please contact us if you wish to obtain more information.

If your data are processed on the basis of consent:

- **you have the right to withdraw consent.** The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- If your data are processed on the basis of consent or in the performance of a contract (necessary for the performance of a service) **you have the right to transfer personal data.**

In order to exercise the aforementioned rights, you need to contact us by going to the [Contact](#) tab, and in respect of particular services – log in to the service and use the IT tools made available for this purpose or notify the relevant [Customer Service Office of a given service or app](#).

In respect of processing of your data by our Partners, management of consents as well as submitting or withdrawing objections to data processing by our Partners may be done by means of a tool that we provide, operating on the basis of a solution provided by an industry organization - Związek Pracodawców Branży Internetowej IAB (Interactive Advertising Bureau) – you may access it at the bottom of this page (“Change your privacy settings” button).

If you request rectification, erasure or restricting the processing of personal data, we will notify recipients of such data to whom personal data were disclosed unless this proves impossible or would involve a disproportionate effort, and at your request concerning your data we will inform you about those recipients.

Who is data disclosed to?

Your data may be provided to entities **processing personal data on behalf of the Controller**, among others to IT services providers, marketing agencies, etc. – but such entities process data under a contract with the controller and solely according to our instructions. In such cases, we require that such third parties keep information confidential and secure and we verify if they use adequate personal data security measures.

Your data may also be disclosed to entities authorized to obtain them pursuant to applicable law, for example law enforcement authorities. To the extent permitted by applicable

provisions of law, we may also provide your data to debt collection and claims trading institutions.

On the basis of your voluntary consent (and in certain cases based on legitimate interest of the controller) granted to Trusted Partners of entities from the Ringier Axel Springer Polska Group for processing of your personal data saved in cookies and cache on your device (including data provided in browsing history and data collected during your activity in the services), as well as location data generated by your device for marketing purposes (together with automated analysis of your activity on websites and in apps in order to specify your potential interests for the purpose of advertisement alignment), including to the placement of flags/markers (cookies, etc.) on your device and reading of such flags/markers, such data may be disclosed to our **Trusted Partners**.

The paragraph above concerns the processing of your personal data for marketing purposes of Trusted Partners. Trusted Partners are e-commerce companies and advertisers as well as media houses acting on their behalf and similar organizations, with which the Ringier Axel Springer Polska Group cooperates or which are recommended by international industry organizations, such as IAB (Interactive Advertising Bureau). The list of Trusted Partners may be found at the bottom of this page (“Change your privacy settings” button).

Transfer of data outside EEA

Our partners have their offices mainly in countries of the European Economic Area (EEA) or in Switzerland which is deemed a country ensuring adequate level of protection for personal data. Some from among our Trusted Partners, for example Google or Facebook, have their offices outside of EEA, however. In connection with transfer of your data outside EEA, we make sure our Partners provide guarantees of high level of personal data protection. These guarantees result, in particular, from using standard contractual clauses accepted by the Commission (EU) as provided in § 46 sec. 2 of the GDPR. You have the right to demand that we provide you with a copy of standard contractual clauses by sending an inquiry.

APPENDIX TO THE PRIVACY POLICY: COOKIES POLICY FOR WEBSITES AND APPS OF RINGIER AXEL SPRINGER POLSKA GROUP ENTITIES

This Cookies Policy constitutes an appendix to the Privacy Policy, forming an integral part thereof.

On our websites and in our apps, we use web flags/markers, such as e.g. cookies or local storage, for the purpose of collecting and processing personal data in order to customize content and advertisements and to analyze traffic on websites, apps and in the Internet. This technology is also used in this manner by entities from the Ringier Axel Springer Polska Group and by our Trusted Partners who also wish to customize advertisements to your preferences.

This Cookies Policy pertains to cookies and other similar technologies which entities from the Ringier Axel Springer Polska Group use of all their websites, including on all websites of the Ringier Axel Springer Polska Group, for example onet.pl, fakt.pl, newsweek.pl, autoswiat.pl, vod.pl, zumi.pl, sympatia.pl, nk.pl, noizz.pl, pclab.pl, businessinsider.com.pl, skapiec.pl, opineo.pl, jakdojade.pl, medonet.pl,

and in Ringier Axel Springer Polska Group mobile apps:

- Onet (iOS, Android)
- Program TV (iOS, Android)
- Pogoda (Android)
- Poczta Onet (Android)
- Fakt24 (iOS, Android)
- BI (iOS, Android)
- Noizz PL (iOS, Android)
- Sympatia (iOS, Android)
- Ekstraklasa TV (iOS, Android)
- Zapytaj
- MobiRadar
- Skąpiec (Android)
- VOD
- Jak dojadę (Android, iOS)
- Test łączy (Android, iOS)
- Forbes Polska
- Newsweek Polska
- Przegląd Sportowy

(hereinafter referred to jointly as: “Ringier Axel Springer Polska Group Websites”)

When using Ringier Axel Springer Polska Group Websites, by appropriate configuration of settings in your browser, you grant consent for using Cookies and other similar technologies in accordance with this Cookies Policy. If you do not consent to using Cookies and other similar technologies or if you want to restrict the permitted scope of using Cookies and other similar technologies, you should change settings in your browser as appropriate (as indicated below) or refrain from using Ringier Axel Springer Polska Group Websites.

What are Cookies?

Cookies are IT data saved in files and stored on terminal equipment of Users of Ringier Axel Springer Polska Group Websites, which the browser sends to the server upon each connection with Ringier Axel Springer Polska Group Websites from a given terminal equipment – when you visit various sites in the Internet (i.e. your computer, tablet, smartphone, etc.).

Cookie usually contains the name of a website it originates from, its lifetime, a unique number generated for the purpose of identifying the browser connecting to the website and any other necessary data. In this Policy, information concerning Cookies is applicable also to other similar technologies used at Ringier Axel Springer Polska Group Websites.

Other technologies similar to Cookies (referred to also as: “other similar technologies”)

In order to ensure efficient use of Ringier Axel Springer Polska Group Websites, we also use other technologies than Cookies, such as Local Storage, the purpose of which is to store data saved when using services in a separate part of browser cache. Access to data in Local Storage may only be obtained by the website whose data were saved in the browser. Data in Local Storage are stored by the browser after it has been closed.

For what purpose are Cookies and other similar technologies used?

The Ringier Axel Springer Polska Group uses Cookies and other similar technologies for the following purposes:

- so that Ringier Axel Springer Polska Group Websites operate faster and are more user-friendly,
- in order to better align content and advertisements available on Ringier Axel Springer Polska Group Websites to expectations and interests of the User,
- in order to facilitate showing advertisements to the User on Ringier Axel Springer Polska Group Websites, customized to User’s interests,
- in order collect aggregate statistics which will allow us to understand how Ringier Axel Springer Polska Group Websites (including our services and our apps) are used and to improve their functionality and content.

On Ringier Axel Springer Polska Group Websites, the following types of Cookies may be used:

- Session Cookies – remain on your device only when using Ringier Axel Springer Polska Group Websites;
- Permanent Cookies – remain on your device until their lifetime expires or until they are removed.

Types Cookies or similar technologies used on Ringier Axel Springer Polska Group Websites

Cookies Type:	For what purpose and how they are used:
Authentication	for identification of a logged User in order to display appropriate information corresponding to User’s interests
Security	support for mechanisms preventing abuse on Ringier Axel Springer Polska Group Websites
Necessary for website operation	Necessary for proper operation and viewing of Ringier Axel Springer Polska Group Websites, they allow you to navigate through the websites and to use website elements. They optimize the use of Ringier Axel Springer Polska Group Websites, for example they may remember previous activities (for example, opened texts) when you return to the website during the same session.
Functional	Remembering your settings and choices (for example, username, region of your location, settings configuration, language and communication preferences as well as user activity history) in order to provide you with customized content and services. They also allow you to watch movies and using social media tools, they are helpful in the process of filling out forms. Irrespective of the above, by means of so called social plugins they provide the User with functionalities, important information and content tailored to User’s needs. In order to ensure proper functionality of Ringier Axel Springer Polska Group Websites, we use data concerning activity on Ringier Axel Springer Polska Group Websites, geolocation data (city) and demographic data (age, sex) – compiled data are aggregated so that the group segment created does not make possible the identification of an individual User ID.

Advertising

Providing you with advertisements corresponding to your activity on Ringier Axel Springer Polska Group Websites, your interests, habits, while limiting the display of the same advertisement or advertisements not compatible with your interests on Ringier Axel Springer Polska Group Websites and on third party websites, for marketing purposes, together with necessary analytics and measurements. For the purposes of displaying advertisements to a specific target group, data concerning browsing history, activity in services (for example, your clicks, purchase history, manner of using services, such as movie searches in vod.pl, content and advertises which have been presented), geolocation data and demographic data may be used. Aforementioned data about Users' activity on Ringier Axel Springer Polska Group Websites may be compiled with demographic data provided by Users upon registration to our services (for example, age, sex, city size) – compiled data are aggregated so that the group segment created does not make possible the identification of an individual User ID solely based on User's profile, and thus User identification based only on profile is impossible. Data so aggregated may be used by entities from the Ringier Axel Springer Polska Group and also disclosed to third parties if there is a legal ground to do so. Advertising Cookies also allow to measure effectiveness of advertising campaigns (for example, thanks to specifying the number of people who clicked on a given ad or were transferred to the advertiser's website).

Do we use Cookies or similar technologies of third parties?

Yes, when using Ringier Axel Springer Polska Group Websites you may receive Cookies from our Trusted Partners. Marketing purposes of our Trusted Partners - our Trusted Partners may use cookies or other similar technologies in order to determine if a specific advertisement was displayed by them or at their request and in order to collect information about how Users react to displayed advertisements. Our Trusted Partners may also, based on User's consent, align displayed advertisements with User's interests specified based on information provided to our Trusted Partners by the User in the course of using websites or apps. If the user granted consent referred to in the preceding sentence, information may also be disclosed for further marketing purposes to other entities that display or order web advertisements. For these purposes, we may also cooperate with Trusted Partners in order to show an advertisement to a User on Ringier Axel Springer Polska Group Websites or outside of them, after the User has visited a certain website or app. Aside from Local storage technology, also other technologies and technical solutions that allow to gain access to information stored in browser/terminal equipment, whose operation is necessary in order to use Ringier Axel Springer Polska Group Websites or desirable due to their specific nature, may be used. We also make use of third party analytics software (e.g. Google Analytics, Gemius) which places codes in the User's terminal equipment that allow collecting data about Users.

How to change Cookies settings or remove Cookies? Most Internet browsers are set to automatically accept Cookies. However, you may change your browser settings to block Cookies – in whole or in part, for example only from third parties, or to each time receive a notification when Cookies are sent to your device. You need to remember though that if you do block Cookies that we use, this may have a negative effect on convenience of use of Ringier Axel Springer Polska Group Websites, for example it's possible you will not receive personalized information when browsing. You will also prevent us from collecting

information about use of our sites, which we need in order to constantly improve content of Ringier Axel Springer Polska Group Websites and services. You can find out [here](#) how to change settings concerning Cookies, Local storage and other technologies, including analytics software, used on Ringier Axel Springer Polska Group Websites, for which the settings change or disabling procedure has not been shown above.

Additional help: Detailed information can be found in settings of your Internet browser. Find the name of your Internet browser below and click on the link to find our more:

Bear in mind that changing settings of cookies and similar technologies may affect the operation of our services.

More information

You can find more information about cookies and similar technologies at wszystkoociasteczkach.pl, youronlinechoices.com or in our Help section [How to change cookie settings?](#) and [Removing cookies in mobile browsers.](#)