

Our Privacy Policy

Privacy Policy

Dear User,

our priority is to protect your personal data and handle them in accordance with applicable rules of law. Our purpose is to provide you with comprehensive information on our processing of your data.

See below to learn how we process your personal data while you are using our online platform.

PRIVACY POLICY OF THE [HTTPS:// WWW.DEBOWATRADE.PL](https://www.debowatrade.pl) ONLINE PLATFORM

I. THE PRINCIPLES OF PROCESSING PERSONAL DATA BY DĘBOWA POLSKA SP. Z O.O. SP. KOMANDYTOWA WITH REGARD TO [HTTPS://WWW.DEBOWATRADE.PL](https://www.debowatrade.pl) PLATFORM USERS

1. DEFINITIONS

1.1. Platform – the “Make a Booking – Dębowa Polska Liquor” platform, available on <https://www.debowatrade.pl>, used to book Products for concessionaires over the Internet on the terms stipulated in the Terms and Conditions of Booking on the Make a Booking – Dębowa Polska Liquor Platform.

1.2. User – the client who has registered the account on the Platform and authorised a natural person, of full legal age, having a full capacity to perform acts in law to use the account on behalf of the Client.

1.3. Controller, Platform Provider - Dębowa Polska Sp. z ograniczoną odpowiedzialnością sp. k, with its business premises and service address at: ul. Wolsztyńska 56, 64 212 Siedlec

1.4. GDPR – the resolution of the European Parliament and Council (EU) 2016/679 dated 27 April 2016 on natural person protection due to personal data processing and on free flow of such data, and repeal of the directive 95/46/CE (General Data Protection Resolution).

Other definitions comply with the Terms and Conditions of Booking on the „Make a Booking – Dębowa Polska Liquor” platform.

2. BASIC INFORMATION

2.1. Our privacy policy describes how Platform users’ personal data are handled.

2.2. The controller of personal data collected through the Platform is:

Dębowa Polska Sp. z ograniczoną odpowiedzialnością sp. k with its registered office in Siedlec (64-212) at ul. Wolsztyńska 56

KRS [National Court Register] 0000678160, NIP [Taxpayer's ID] 9230025244, REGON [Business ID] 008387582

2.3. You can contact us by phone, dial: +48 68 3848516, or by electronic means by sending a message to debowa@debowa.pl, or by traditional post by sending a letter to the Controller's head office.

2.4. We process your personal data in accordance with applicable rules of law, particularly in line with the resolution of the European Parliament and Council (EU) 2016/679 dated 27 April 2016 on natural person protection due to personal data processing and on free flow of such data, and repeal of the directive 95/46/CE (General Data Protection Regulation).

2.5. The Controller has appointed the Data Protection Coordinator (DPC) who can be contacted on any matters related to personal data processing and protection via e-mail: kod@debowa.pl or a letter sent to the Controller's head office address.

3. PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA VIA THE [HTTPS:// WWW.DEBOWATRADE.PL](https://www.debowa.pl) PLATFORM

3.1.1. If you log into the Platform using the login data provided by the Platform Provider, your personal data will be processed in order to fulfil the product booking order on the basis of the User's contact data that have been entered in the agreement signed with the Controller or that you have updated while using the Platform. The legal basis for processing personal data is the Controller's legally justified interest, that is the response to the User with regard to the product booking made through the Platform and further communication with the User on the product booking (art. 6 para. 1 f) of the GDPR).

3.1.2. If you apply to us to receive a commercial offer, your personal data will be processed in this respect, that is taking actions at the request of the person who the data apply to, before the agreement is signed (if you are a party to the agreement) or on the basis of our legally justified interest, that is presentation of the offer (art. 6 para. 1 f) of GDPR) if you represent the legal entity.

3.1.3. Your personal data may also be processed to pursue claims or defend against claims as well as for archival purposes on the basis of our legally justified interest (art. 6 para. 1 f) of GDPR), that is pursuance and defence against claims and data archiving.

3.1.4. [Marketing approvals] If you proceed to fill in the Registration Form and select voluntary permits (for mailing marketing or phone marketing), your personal data, depending on approvals and data, will be processed for the purposes of:

a. sending the marketing and commercial contents concerning our offer by electronic means to your e-mail address by the Controller in the future;

b. contacting you in the future by phone in order to present you with marketing and commercial contents concerning our offer, using your phone number given in the form.

3.1.5. We wish to inform your that we are not going to be insistent in communication for marketing purposes and we are going to contact you only when we have a new product to show.

3.1.6. Please remember that you have a right to withdraw your marketing approvals at any time. The withdrawal does not affect legal compliance of processing made on the basis of the approval before it has been withdrawn.

3.1.7. The legal basis for processing personal data for marketing purposes via the e-mail address or phone number, as described in 3.1.3 above, is the art. 6 para. 1 a) of GDPR.

4. USERS' RIGHTS

4.1. Pursuant to the principles referred to in GDPR, you have the following rights related to your data processed via our Platform:

4.1.1. the right to access your data and obtain their copy (art. 15 of GDPR);

4.1.2. the right to demand rectification of your personal data (art. 16 of GDPR);

4.1.3. the right to demand deletion of your data (art. 17 of GDPR);

4.1.4. the right to demand limitation of data processing (art. 18 of GDPR);

4.1.5. the right to demand the transfer of data, that is to receive personal data from the Controller in a structured commonly used machine-readable format, to the extent that the data are processed on the basis of the consent or for the purposes of concluding and executing the agreement in an automated manner (art. 20 of GDPR);

4.1.6. the right to object to personal data processing on the basis of the legally justified interest, including for marketing purposes (art. 21 of GDPR);

4.1.7. the right to withdraw the consent – if the data are processed on the basis of the consent given, the User has a right to withdraw it at any time, which however does not influence legality of the processing made before withdrawal;

4.1.8. the right to withdraw the e-mail or phone marketing approval – if you have given your consent for you being contacted for marketing or commercial purposes to the e-mail address or phone number entered in the form, you have a right to withdraw such an approval at your convenience.

4.1.9. You also have a right to lodge a complaint to the Head of the Personal Data Protection Office if you believe that processing of your personal data violates provisions of the GDPR.

4.2. How to exercise one's rights?

4.2.1. To exercise your rights, please send an application with your request to either of the following e-mail addresses: debowa@debowa.pl or kod@debowa.pl.

4.2.2. If we fail to respond within 14 days (sometimes e-mail messages do not reach their addressees or enter the SPAM box), please call us at +48 68 384 85 16.

4.2.3. With regard to receiving marketing and commercial messages via your mailbox, you can always feel free to unsubscribe from the list (cancel the subscription) and therefore withdraw your marketing approval by informing us about such a withdrawal.

5. DATA RECIPIENTS

5.1. To make sure the Platform Provider and Platform itself operate properly, the aforesaid Provider must use services rendered by third-party entities. The Controller cooperates only with entities who can guarantee implementation of suitable technical and organisational means that assure compliance with GDPR requirements and protect rights of persons who the data apply to.

5.2. The Users' personal data can be handed to the following recipients or categories of recipients: service providers that supply the Controller with IT solutions, technical and organisational solutions, that allow the Controller to run a company, including Platforms and electronic services (in particular Platform-operating PC software suppliers, electronic post providers and server hosting providers as well as company-managing firmware suppliers and Controller technical assistance software suppliers), and couriers, financial and accounting companies, legal agencies and advisors who provide the Controller with required support.

6. STORAGE PERIOD

6.1. The personal data processed on the basis of the legally justified interest (art. 6 para. 1 f) of GDPR) will be processed for as long as the interest remains existent or until an effective objection to processing of data is raised.

6.2. The data processed for marketing communication purposes will be processed until the approval is withdrawn. However the marketing approval withdrawal notice will be processed for 2 years to ensure accountability, in case of inspection by the Personal Data Protection Office and defence against potential claims.

6.3. The data processed on the basis of the agreement (art. 6 para. 1 b) of GDPR) will be processed during the term of the agreement and then for the period of limitation of mutual claims.

7. NOTICE ON REQUIRED/VOLUNTARY DATA PROVISION

7.1. Providing personal data is voluntary, yet may prove required to achieve the specific purpose of processing.

7.2. In the product booking form, available on the Platform, required fields have been marked with an asterisk. Entering other data into forms is voluntary.

8. INFORMATION ON LACK OF PROFILING AND NON-DISCLOSURE OF DATA OUT OF EEA

The Users' personal data will neither be subject to the automated decision-making process, including profiling, nor handed out of the European Economic Area.

II. PRINCIPLES OF USING COOKIES BY [HTTPS:// WWW.DEBOWATRADE.PL](https://www.debowaTrade.pl)

1. WHAT ARE COOKIES

1.1. Cookies are small text files with small pieces of data, sent through the server and saved in the Platform visitor's device (e.g. PC hard drive, laptop, or smartphone memory card – depending on the equipment used).

1.2. At this time the data are collected and stored only in an anonymous form or under the nickname, and do not allow the Controller to identify the User. The cookie cannot do any harm to the User's computer and is free from viruses.

2. WHAT COOKIES WE USE AND FOR WHAT?

The cookies used by the Platform can be categorised in the following way:

a. Strictly necessary cookies – required for proper operation of basic modules of the Platform (login, exchange rate search engines, privacy preferences). If you block these files, you will cause the website to malfunction. Strictly necessary cookies do not store any personal data.

3. HOW TO MANAGE COOKIES?

3.1. When you enter the Platform for the first time, you can see the information on using the cookies technology in accordance with rules set in your web browser. The notice is displayed at the bottom of the screen.

3.2. The Controller informs the User about possibility of setting the web browser up in the way that allows storing cookies in the User's final device.

3.3. Once the Controller has saved cookies, the User can delete all of them. In so doing, relevant web browsers functions (cookies clearing function) or special-purpose programs can be used. Alternatively it is possible to take advantage of suitable tools available in the operating system used by the User.

The Privacy Policy as of 1 March 2024.