

# PRIVACY POLICY OF THE HABIscore WEBSITE

This Privacy Policy sets out the rules for processing the personal data of users of the HABIscore website available at: <https://habiscore.pl/> (hereinafter: the "Website"), in accordance with 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).

## 1. Definitions

- User – any natural person visiting the Website.
- Website – the website operated at: <https://habiscore.pl/>.
- GDPR – 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.

## 2. Data Controller

The data controller is HAG Tomasz Bogusz with its registered office in Gdańsk, at ul. Wajdeloty 19/2, 80-437 Gdańsk, NIP: 8251867025, REGON: 220566412

Contact e-mail: [kontakt@habiscore.pl](mailto:kontakt@habiscore.pl).

## 3. Source of Personal Data

HAG receives personal data directly from Users, including in particular in connection with the completion of the Order Form. In connection with the use of the Website, we collect data to the extent necessary for the provision of individual services, as well as data on the activity of visitors to the Website. The detailed rules and purposes of data processing are described below.

## 4. Purpose and Legal Basis for Processing Personal Data

### 4.1 Use of the Website

HAG processes information about visitors to the Website collected via cookies and other similar technologies.

The Website uses its own and third-party cookies for the following purposes:

- a) necessary cookies:
  - ensuring the proper functioning of the Website;

b) optional cookies:

- convenient use, including remembering User preferences (functional/preference cookies),
- monitoring website traffic, analysing user behaviour, evaluating the effectiveness of the Website for business purposes, optimising the Website, and preparing reports and analyses (analytical/statistical cookies) using solutions such as: Google Analytics, a tool provided by Google Inc. ("Google"), and Microsoft Clarity, a tool provided by Microsoft Ireland Operations Limited ("Microsoft").

The use of this category of cookies is based on your consent. You may withdraw your consent and stop the exchange of data via cookies at any time. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal. Users may manage their consent to the storage of optional cookies via the cookie settings banner on the Website.

### **Personal data vs cookies**

Information obtained through the cookie mechanism and operational data may constitute personal data within the meaning of the GDPR in certain exceptional situations. If the information indicated above is classified as personal data, the data controller is HAG. Data used to ensure the proper functioning of the website's features are processed on the basis of the Controller's legitimate interest (Art. 6(1)(f) GDPR). However, if consent is given to the sending of "optional" cookies, the information collected in this way will be used to examine the preferences of persons using our Website and to prepare appropriate marketing activities. In this case, the legal basis for data processing is the consent expressed by the user referred to in Art. 399 of the Act of 12 July 2024 – Electronic Communications Law.

### **4.2 Placing Orders via the Order Form**

Providing personal data is required to place an order. HAG processes personal data for the purpose of concluding and performing an agreement for the provision of services by electronic means in connection with the execution of sales via the Website – the legal basis is the necessity of processing for the performance of the agreement binding the parties (Art. 6(1)(b) GDPR).

### **4.3 Submitting Complaints**

Providing personal data is required for the consideration of complaints. HAG processes personal data for the purpose of handling complaints, on the basis of the Controller's legitimate interest (Art. 6(1)(f) GDPR).

### **4.4 Establishment and Pursuit of Claims**

HAG processes personal data for the purpose of the potential establishment and pursuit of claims or defence against them. The legal basis is the Controller's legitimate interest consisting in the protection of its rights (Art. 6(1)(f) GDPR).

## 4.5 Marketing and Profiling

HAG may process personal data for marketing purposes, promoting its services on the basis of the legitimate interest of conducting marketing activities promoting services (Art. 6(1)(f) GDPR) – based on the so-called "marketing consent" expressed by the User. In order to create a User profile and tailor direct marketing to their preferences, HAG may automatically process and profile personal data, provided that such automated processing will not produce legal effects concerning the User or similarly significantly affect their situation. Please note that you have the right to withdraw your marketing consent at any time by contacting us, which however does not affect the lawfulness of sending marketing content to you prior to its withdrawal.

## 5. Recipients of Personal Data

HAG may share your personal data with entities whose support it uses in operating the Website and providing services, including:

- entities providing tools for the automation of mass message sending,
- entities providing marketing services, including advertising agencies,
- entities providing technical support,
- Google Inc. in the scope of the Google Analytics service,
- Microsoft Inc. – data processing policy: <https://privacy.microsoft.com/pl-pl/privacystatement>.

Where required by applicable law, we will disclose personal data to other entities, mainly public entities, including in response to a court order, summons or other legal request or query carried out in the exercise of public authority, and only if such request is based on an appropriate legal basis. Beyond the situations described above, we do not sell or transfer personal data to third parties.

## 6. Transfer of Personal Data to Third Countries

Data collected via cookies may be transferred outside the EEA on the basis of: Standard Contractual Clauses and a European Commission decision finding an adequate level of protection of personal data under the Data Privacy Framework ("DPF"). For website analysis we use the Google Analytics service provided by Google Inc. with the "anonymizeIp()" extension, which means that IP addresses are processed after truncation in a way that limits the possibility of linking them to specific individuals. Currently, data may be transferred outside the EEA in the context of cooperation with entities such as:

- Google Inc. within the Google Analytics website analysis service,
- Microsoft in the scope of processing queries submitted via the order form and in the scope of the use of the Microsoft Clarity tool.

## 7. Retention Period for Personal Data

The data processing period is determined on the basis of the existing purpose of processing. Accordingly:

- if data processing is carried out on the basis of the Controller's legitimate interest – data are processed for the period enabling the realisation of that interest or until an effective objection to data processing is raised,
- if the legal basis for processing is the necessity for concluding and performing an agreement, data are processed until the agreement is in force and the period for pursuing or defending against claims has expired,
- if the legal basis for data processing is consent, data are processed until it is withdrawn or the purpose of processing ceases.

## 8. Automated Processing of Personal Data

HAG does not use personal data for the purpose of automated decision-making (including in the form of qualified profiling) in such a way that, as a result of such automated processing, any decisions could be made that would produce legal effects or similarly significantly affect Users.

## 9. Server Logs

Use of the Website involves sending queries to the server on which the page is stored and recording them in server logs. Logs are saved and stored on the server. This data is used solely for the purpose of administering the Website and ensuring the most efficient handling of the hosting services provided. The browsed resources are identified by URL addresses. Additionally, the following may be recorded:

- the time the query was received,
- the time the response was sent,
- the name of the User's workstation – identification carried out by the HTTP protocol,
- information about errors that occurred during HTTP transaction processing,
- the URL address of the page previously visited by the User (referrer link) – in the event that the transition to the Website occurred via a link, information about the user's browser,
- information about the IP address.

The above data are not associated with specific persons browsing the pages.

The above data are used solely for the purposes of server administration.

## 10. Rights in Connection with the Processing of Personal Data

In connection with the processing of personal data, the data subject has the right to:

- access to the content of their personal data, the right to request its rectification or erasure under the rules set out in Art. 15–17 GDPR;
- restriction of processing in the cases specified in Art. 18 GDPR;
- withdrawal of consent at any time without affecting the lawfulness of processing carried out on the basis of consent prior to its withdrawal. Consent may be withdrawn by sending a request to the e-mail address: [kontakt@habiscore.pl](mailto:kontakt@habiscore.pl);
- the right to data portability under the rules set out in Art. 20 GDPR;
- the right to object to data processing under the rules set out in Art. 21 GDPR;
- the right to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office.

At the same time, the User has the option to manage their cookie preferences via the cookie banner available on the Website.

## 11. Supervisory Authority

If you find that the processing of your personal data by the Controller is not in compliance with data protection regulations, you have the right to lodge a complaint with the President of the Personal Data Protection Office, ul. Moniuszki 1A, 00-014 Warsaw. Detailed information on how to lodge a complaint can be found at: <https://uodo.gov.pl/pl/>.

Any comments or objections regarding the manner in which your data are processed should be sent by traditional post to the Controller's address or via e-mail to: [kontakt@habiscore.pl](mailto:kontakt@habiscore.pl).

## **12. Changes to the Policy**

Finally, we would like to inform you that we reserve the right to amend the above privacy policy. Such changes may be made by publishing a new privacy policy on our website. After the change is made, the Privacy Policy will appear on the page with a new date.

The current version of the Privacy Policy is effective as of 15.05.2026.