

PRIVACY POLICY

Justtag Sp. z o.o.

I. GENERAL INFORMATION

This privacy policy applies to all cases in which Justtag sp. z o.o. is a data controller and processes personal data. This applies both to cases in which Justtag sp. z o.o. processes personal data obtained directly from the data subject, as well as to cases in which Justtag sp. z o.o. has obtained personal data from other sources.

Protection of your personal data is particularly important to us. We process your data only on the basis of the applicable legal regulations, i.e. Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and the repeal of Directive 95/46/EC ('GDPR'), and the Act of 10 May 2018 on personal data protection.

Justtag sp. z o.o. is a member of IAB (Interactive Advertising Bureau - Internet Industry Employers Association), i.e. association of entities from the Internet industry, whose goal is to undertake activities aimed at representing the interests of these entities, promotional activities and ensuring legal protection. Justtag sp. z o.o. acknowledges the principles adopted by IAB within the IAB Europe Transparency & Consent Framework, i.e. the structure which aims to create a standard of personal data processing and unifying the principles of their processing in order to better protect them.

In all matters regarding the processing of personal data and the exercise of rights related to data processing, you can contact the Data Protection Inspector appointed by Justtag sp. z o.o. by e-mail at iod@justtag.com or by letter sent to the registered office address indicated below:

Justtag sp. z o.o.
Al. Ujazdowskie 13
00-567 Warsaw

II. DEFINITIONS

Data Controller/Company/Justtag sp. z o.o. – Data controller within the meaning of Article 4(7) of GDPR; the Data Controller is Justtag sp. z o.o. with its registered office at: Al. Ujazdowskie 13, 00-567 Warsaw, entered into the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw, Warsaw, 12th Commercial Division of the National Court Register under KRS number 0000463888, with tax identification number (NIP) 7010382337.

GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.

Personal Data – information about an identified or identifiable natural person ('data subject'); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as first and last name, identification number, location data, internet identifier or one or more factors specific to an individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Cookie files, Identifiers - (also known as 'Cookies') and other user identifiers - mean small information files sent by the website that the User visits and which are then saved on the User's end device (computer, laptop, smartphone, tablet, etc.) that the User uses when browsing the website. These files may contain, among other things, information about the way the User uses the website.

User – a natural person whose personal data are saved in the Cookies placed on websites by the Data Controller.

III. PERSONAL DATA

1. What data we collect, what is the purpose, period and legal basis for data processing

a) Contact by phone or e-mail

The data are processed for the purpose of direct contact with the data subjects.

The processed data include: first and last name, company, position, e-mail address, telephone number.

The basis for data processing is Article 6(1)(a) of GDPR, i.e. the consent of the data subject and Article 6(1)(f) of GDPR i.e. the contact with customers/contractors, which is a legitimate interest of the Data Controller.

The data will be processed until the withdrawal of consent or deletion after a periodical update review.

b) Keeping accounting records

The data are processed for the Administrator's accounting services.

The processed data include: first and last name, address, company name, identification number, bank account number.

The basis for data processing is Article 6(1)(b) of GDPR, i.e. processing of data for the purpose of performing a contract, and Article 6(1)(c) of GDPR, i.e. fulfilling the legal obligation imposed on the Data Controller in relation to the performance of tasks resulting from the Tax Ordinance and the Accounting Act.

The data will be processed until tax settlements are completed.

c) Exercise of the right to claim.

The data are processed to enable the Data Controller to pursue his claims or to defend against the claims of the other party.

The processed data include: first and last name, company name, position, address, telephone number.

The basis for data processing is Article 6(1)(f) of GDPR i.e. pursuing claims or defending against claims of the other party, which is a legitimate interest of the Data Controller

The data will be processed until the expiry of the statute of limitations for claims.

d) Recruitment of employees

The data are processed in order to carry out the recruitment process for vacancies.

The scope of the processed data is in accordance with Article 22¹§1 of the Labor Code and additional data provided to us by candidates for work.

The basis for data processing is Article 6(1) letters a, c and f of GDPR, i.e., the consent of the data subject, the fulfilment of the legal obligation imposed on the Data Controller in relation to the performance of the tasks arising from the Labor Code and the realization of the legally justified interests of the Data Controller - recruitment of employees. Providing us with the data is voluntary, and failure to provide the data will make it impossible to participate in the recruitment process.

The data will be processed for 6 months from the end of the recruitment process or until the withdrawal of consent.

e) Social media profiles (fanpages)

The data are processed for the purpose of marketing the Data Controller's services. The scope of the processed data is consistent with the data made available to us on our social profiles.

The basis for data processing is Article 6(1) letters a and f of GDPR, i.e. the consent of the data subject and the realization of legally justified interests of the Data Controller - marketing of services. Posting comments on our fanpages and sending private messages to us is treated as your consent to data processing.

The data will be processed until the withdrawal of consent.

Additionally, we would like to inform you that visiting the fanpages and interacting with them in any way will also give the social network access to your personal data as a separate Data Controller.

You can find information about the processing of personal data by Facebook here:

<https://www.facebook.com/privacy/explanation>

You can find information about the processing of personal data by LinkedIn here:

<https://www.linkedin.com/legal/privacy-policy>

f) Providing the JUSTWIFI service

The data are processed to provide Internet access point services in different locations.

The scope of processed data includes: first and last name, e-mail address, telephone number, cookies, IP Address, Mac Address location data, history of browsed websites.

The basis for data processing is Article 6(1)(a) of GDPR, i.e. the consent of the data subject to marketing activities concerning products and services of third parties (including analysis and profiling of data for marketing purposes), Article 6(1)(b) of GDPR, i.e. processing of data for the purpose of execution of agreement between Justtag and the User for the performance of the service and Article 6(1)(f) of GDPR, statistical measurements and marketing of the Data Controller's products and services (including the analysis and profiling of data for marketing purposes), which constitutes a legally justified interest of the Data Controller.

The data will be subject to profiling and automated decision-making process in marketing activities.

The data will be processed until the withdrawal of consent, effective objection to the processing of the data and for the duration of the agreement, with the proviso that sometimes, the data may also be processed after the expiration of the agreement, however, only if this is permitted or required under the applicable law, e.g. processing for statistical, billing purposes or to pursue claims (maximum 3 years).

Providing of personal data for the provision of services is voluntary, however, failure to provide data marked as necessary for the provision of services will make it impossible to provide them.

f) Access to the KoalaMetrics service

The data are processed for the purpose of providing the KoalaMetrics service.

The scope of the processed data includes: user's advertising ID, information about WiFi networks within the range of the user of the application, signal strength and time of appearance within the range of a given network, as well as information about the device model, operating system, set language and time zone.

The basis for data processing is Article 6(1)(a) of GDPR, i.e. the consent of the data subject to marketing activities concerning Justtag products and services and third parties (including analysis and profiling of the data for marketing purposes),

The data will be subject to profiling and automated decision-making process in marketing activities.

The data will be processed until the withdrawal of consent or deletion after a periodical update review.

We provide personal data to the following categories of entities processing data on behalf of the Data Controller: entities owning the servers on which the Data Controller stores personal data, our trusted partners, an entity providing financial and human resources services to Justtag sp. z o.o., entities providing consulting services, a law firm cooperating with us, entities providing postal and courier services and authorized state authorities.

In the scope referred to above, personal data may be transferred to recipients whose seats are located outside the European Economic Area. In case the data are transferred to any country, in relation to which the European Commission's decision on the determination of the appropriate level of protection was issued, the personal data are protected at the level ensured by the EU law. In other cases, personal data are transferred on the basis of the application of standard EU data protection clauses in contracts between the Data Controller and recipients.

To obtain a copy of the standard EU data protection clauses applied by the Data Controller, please contact us directly.

IV. RIGHTS OF PERSONS WHOSE DATA ARE PROCESSED BY THE DATA CONTROLLER

1. You have the right to obtain confirmation from the Data Controller whether personal data concerning you are being processed and, if so, to obtain access to them and the following information:
 - a) the purpose of the processing;
 - a) the categories of personal data concerned;
 - b) information about the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular those in third countries or international organizations;
 - c) as far as possible, the intended period of storage of the personal data and, where this is not possible, the criteria for determining that period;
 - d) information about the right to request from the Data Controller the rectification, erasure or restriction of the processing of personal data concerning the data subject and to object to such processing;
 - e) information on the right to lodge a complaint with the supervisory authority;
 - f) if personal data have not been collected from the data subject, all available information about their source;
 - g) information about automated decision making, having legal effects (or affecting the data subjects in a similarly significant way) referred to in Art. 22 paragraph 1 and 4 of GDPR, and - at least in these cases - relevant information about the principles of such decision making, as well as about the meaning and expected consequences of such processing for the data subject - at present the Data Controller is not carrying out such activities.
2. You have the right to demand from the Data Controller to immediately correct any personal data concerning you that is incorrect. Taking into account the purposes of the processing, data subjects have the right to request the completion of their incomplete personal data, including by submitting an additional statement.
3. You have the right to demand from the Data Controller to delete your personal data immediately, and the Data Controller is obliged to delete your personal data without undue delay if one of the following circumstances should occur ('right to forget') :
 - a) personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - b) you have withdrawn the consent on which the processing is based in accordance with Article 6(1)(a) of GDPR and there is no other legal basis for the processing;
 - c) you object to the processing pursuant to Article 21(1) of GDPR and there are no overriding legitimate grounds for processing or you object to the processing pursuant to Article 21(2) of GDPR
 - d) personal data have been unlawfully processed;
 - e) personal data must be deleted in order to comply with a legal obligation under European Union or Member State law to which the Data Controller is subject;
 - f) personal data have been collected in connection with offering information society services referred to in Article 8 (1) of GDPR.

4. You have the right to demand from the Administrator to limit the processing in the following cases:
 - a) you are questioning the correctness of your personal data - for the period allowing the Data Controller to check the correctness of the data;
 - b) the processing is unlawful and you object to the deletion of your personal data, requesting in return a restriction of their use;
 - c) the Data Controller no longer needs the personal data for the purposes of processing, but the data subject needs them to establish, pursue or defend his/her claims; you have lodged an objection under Article 21 (1) of GDPR to the processing, until it is determined whether the legitimate grounds on the part of the Controller take precedence over the grounds of the data subject's objection.
5. If personal data are processed for the purposes of direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him/her for the purposes of such marketing, including profiling, to the extent that the processing is related to such direct marketing ('right to object').
6. You have the right to receive in a structured, commonly used machine-readable format your personal data concerning you, which you have provided to the Data Controller, and you have the right to send this personal data to another Data Controller without hindrance from the Data Controller to whom you have provided this personal data if:
 - (a) processing is based on consent pursuant to Article 6(1)(a) of GDPR or on an agreement pursuant to Article 6(1)(b) of GDPR; and
 - (b) processing is carried out in an automated manner.
7. In exercising your right to data transfer, you have the right to request that your personal data be transferred by the Data Controller directly to another Data Controller, if this is technically possible.
8. You have the right to revoke your consent to the processing of your personal data, granted under Art. 6(1)(a) of GDPR, at any time. Withdrawal of consent does not affect the lawfulness of the processing carried out before its withdrawal.
9. In order to exercise the aforementioned rights, you must contact the Data Controller in the way set out in the 'General Information' section.
10. If it is found that the processing of your personal data violates the provisions of GDPR, you have the right to lodge a complaint with the national supervisory authority appointed to protect personal data.

V. DATA SECURITY

Personal data processed by us are stored on dedicated servers, and only authorized employees of the Data Controller have access to them. Taking care to provide appropriate protection measures, all our systems are designed with data protection and data security in mind.

We strive to secure the confidentiality of the data processed by us, both in technological (by using appropriate equipment and tools), organizational (procedures related to data processing have been introduced) and personal scope (authorizations to process data have been granted to particular people and we conduct periodic training of employees).

Apart from HR and financial data, which are processed in a special way, the Data Controller does not collect any sensitive or personal data, the disclosure or possible theft of which could cause damage to the data subject.

VI. INFORMATION ABOUT COOKIES

Generally, when visiting our website you can use it without providing any personal information, however, some user behavior is subject to server-layer login and serves the purpose of server administration and efficient operation of the website.

Web server logs collected by the hosting operator may include such information as:

1. Date and time of access to our website
2. IP address
3. Browser type and version
4. The operating system used by the access system
5. Subpages visited on our website
6. The referring site from which the system gained access to our website
7. Information about errors that may occur during the execution of http transcriptions

The above data are collected automatically and result from the operation of cookies and the use of Google Adwords and Google Analytics tools.

This is done for the following purposes:

1. Proper display of our website content
2. Statistical analysis
3. Ensuring safety

Our website uses cookies.

1. Cookie files (so-called 'cookies') are IT data, in particular text files, which are stored on your terminal device and are designed to use websites. Cookies usually contain the name of the website from which they come, the time they are stored on your terminal device and a unique number.
2. We are the entity that places cookies on your terminal device and obtains access to them.
3. Cookies are used to implement important marketing techniques.
4. Within the framework of our website two basic types of cookies are used: 'session' (session cookies) and 'persistent' (persistent cookies). Session cookies are temporary files that are stored on your terminal device until you log out, leave the website or turn off the software (web browser). 'Persistent' cookies are stored in your terminal device for the time specified in the parameters of the cookies or until they are deleted by the User.
5. Web browsing software (web browser) usually by default allows you to store cookies on your terminal device. You can change your settings in this area. The Internet browser allows you to delete cookies. It is also possible to automatically block cookies. Detailed information on this subject can be found in the help section or documentation of the Internet browser.
6. Restrictions on the use of cookies may however affect some features available on our website.
7. Cookie files placed on your terminal device may also be used by entities cooperating with us, in particular companies: Google (Google Inc. based in the USA), Facebook (Facebook Inc. based in the USA) and are subject to their own privacy policy.

How can you manage cookies and how can you give and withdraw consent?

1. If you do not want to receive cookies, you can change your browser settings. We reserve the right to disable the use of cookies necessary for authentication processes, security, maintenance of your preferences may make it more difficult, and in extreme cases may prevent you from using our website.
2. To manage your cookie settings, select the web browser you are using from the list below and follow the instructions:
 - a) Edge
 - b) Internet Explorer

- c) Chrome
- d) Safari
- e) Firefox
- f) Opera

Mobile devices:

- a) Android
- b) Safari (iOS)
- c) Windows Phone

VII. CHANGE OF THE PRIVACY POLICY

We reserve the right to make periodic changes to this privacy policy to ensure that it meets the applicable legal requirements and the requirements of technological progress.

The contents of the www.justtag.com website are protected by copyright, and their copying, distribution or actions of similar nature require our consent.

Last update: 10th September 2020