

Privacy policy of the Elfaro Website ("Website")

Dear User!

We are committed to protecting your privacy and want you to feel comfortable while using our services. This is why we would like to present you with the most important information on principles regarding the processing of your personal data and the cookies used by our Website. This information was prepared in compliance with the GDPR – the General Data Protection Regulation.

PERSONAL DATA CONTROLLER

I365 SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered seat at: ul. Czerniawska 2A/27, 50-576 Wrocław, entered into the National Court Register – register of entrepreneurs kept by the Regional Court for Wrocław Fabryczna in Wrocław, 6th Commercial Division of the National Court Register, under the KRS number: 0000813868, NIP number: 8943148186, REGON number: 384870456.

If you want to contact us in relation to the processing of your personal data, please send an e-mail to: gdpr@elfaro.cloud.

YOUR RIGHTS

You have the right to:

- access your personal data, including to obtain a copy of your data (Article 15 of the GDPR or, if applicable, Article 13 (1) (f) of the GDPR),
- correct them (Article 16 of the GDPR),
- delete them (Article 17 of the GDPR),
- limit their processing (Article 18 of the GDPR),
- transfer data to another controller (Article 20 of the GDPR).

Furthermore, you have the right to:

- object to the processing of your data at any time:

- for reasons related to your particular situation – regarding the processing of your personal data in accordance with Article 6 (1) (f) of the GDPR (i.e., based on our legitimate interests), including profiling (Article 21 (1) of the GDPR);
- if the personal data are processed for direct marketing purposes, including profiling, within the scope in which the processing is related to such direct marketing (Article 21 (2) of the GDPR).

Please contact us if you want to exercise your rights. The objection to our use of cookies (about which you can read below) can be expressed, in particular, through the appropriate browser settings.

If you think that your data are processed unlawfully, you can submit a complaint to the President of the Personal Data Protection Office.

PERSONAL DATA AND PRIVACY

Below you will find specific information about the processing of your data depending on the actions you take.

1. Using services offered on the Website

What for?	
implementation of the contract for the provision of services within the Website	
On what basis?	
contract on the provision of services or activities undertaken at your request aiming at its conclusion (Article 6 (1) (b) of the GDPR)	in the case of paid services – our legal obligation to process your personal data (Article 6 (1) (c) of the GDPR)
For how long?	
for the duration of the contract binding us or – if the contract is not concluded – for 12	until the legal obligation related to

months *	accounting ceases to apply
<i>furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)</i>	
What happens if you do not provide us with data?	
you will not be able to use our services	

* depending on whichever is applicable in that case and whichever takes place sooner.

2. Contacting us (e.g., making an inquiry)

What for?	
processing of your inquiries or submissions	
On what basis?	
contract or actions taken at your request to conclude it (Article 6 (1) (b) of the GDPR) – if your inquiry or notification concerns a contract that we are or may be a party to	our legitimate interest in processing your data is to communicate with you (Article 6 (1) (f) of the GDPR) – if your inquiry or notification is not related to the contract
For how long?	
for the duration of the contract binding us or – if the contract is not concluded – for 12 months *	for 12 months or until we accept your objection to the processing *
<i>furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)</i>	
What happens if you do not provide us with data?	

we will not be able to respond to your inquiry or application

* depending on whichever is applicable in that case and whichever comes sooner

3. Browser settings and other similar activity allowing for marketing activities

What for?
direct marketing based on displaying personalised ads (for more information see the “Profiling” and “Cookies” sections of our Privacy Policy).
On what basis?
our legitimate interest consisting in the processing of data for the purposes mentioned above (Article 6 (1) (f) of the GDPR)
For how long?
until the cookie validity expires or until you delete the cookie files used for marketing purposes*
What happens if you do not provide us with data?
you will not receive suggestions of products or services you may be interested in

* depending on whichever is applicable in that case and whichever comes sooner.

4. Browser settings and other similar activity allowing for analytical activities

What for?
analysis of how you use and navigate the Website, to adapt it to the User’s needs and behaviour (for more information on that topic read the “Analytical Activities” and “Cookies” sections of our Privacy Policy)

On what basis?
our legitimate interest consisting in the processing of data for the purposes mentioned above (Article 6 (1) (f) of the GDPR)
For how long?
until the cookie validity expires or until you delete the cookie files used for analytical purposes*
What happens if you do not provide us with data?
we will not take your preferences regarding the use of the Website into consideration when developing it further

* depending on whichever is applicable in that case and whichever comes sooner.

5. When you agree to receive marketing content from us (e.g., information on special offers)

What for?
sending marketing information, especially special offers
On what basis?
Your consent to our marketing activities (Article 6 (1) (a) of the GPDR)
For how long?
until you withdraw your consent – remember, you can do that at any time. Processing of data until you withdraw your consent is compliant with the law.
<i>furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)</i>

What happens if you do not provide us with data?
you will not be able to receive our marketing materials, including the information on our special offers.

6. Newsletter subscription

What for?
sending the newsletter
On what basis?
contract for the provision of services (Article 6 (1) (b) of the GDPR)
For how long?
until you unsubscribe from our newsletter
<i>furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)</i>
What happens if you do not provide us with data?
you will not be able to receive information concerning the Website and our services

7. Taking action or refraining from taking action which may result in claims related to the Website or our services

What for?
determination, investigation or defence of claims related to the concluded contract or services provided

On what basis?
our legitimate interest consisting in the processing of data for the purpose indicated above (Article 6 (1) (f) of the GDPR)
For how long?
until the redress period expires or until we accept your objection to the processing*
What happens if you do not provide us with data?
no possibility to determine, assert or defend claims

* depending on whichever is applicable in that case and whichever takes place sooner

PROFILING

We use profiling on our Website – this takes place if your browser settings allow such activities. Profiling is based on an automatic evaluation of what products or services you may be interested in, using information about the content displayed by you. Thanks to this, product or service advertisements displayed on the Website will be more suited to you and to your needs.

The kind of profiling we carry out does not lead to making decisions which would have legal effects for you or would affect you in any similarly relevant way.

ANALYTICAL ACTIVITIES

As part of the Website, we conduct analytical activities aimed at increasing its intuitiveness and accessibility – this takes place if your browser settings allow such activities. As part of the analyses, we will take the way you navigate the Website into consideration, for example, how much time you spend on a given page, or which places of the Website you click on. That way we can customise the layout and appearance of the Website and the content we post on it to the needs of Users.

DATA SAFETY

While processing your personal data, we use organisational and technical measures which comply with the relevant provisions of law, including encrypting the connection with the use of an SSL certificate.

COOKIES

This Website, like most Internet websites, uses the so-called cookies. These cookies:

- are stored in the memory of your device (computer, mobile phone, etc.);
- do not introduce any changes in the settings of your device.

On this Website, cookies are used for the purposes of:

- remembering your session,
- collecting statistical data,
- collecting marketing data,
- making the functions of the Website available.

To learn how to manage cookies and disable them in your browser, you can use help files of your browser. You can get more information about this topic by pressing F1 while using the browser. Additionally, you can find relevant information on the following pages, depending on the browser you use:

- [Firefox](#)
- [Chrome](#)
- [Safari](#)
- [Internet Explorer / Microsoft Edge](#)

Below you will find information about the features of the cookie files we process and their period of validity:

cookie file name	cookie validity period	cookie function
pll_language	365 days	storing information about the selected website language

comment_author_	348 days	stores your username, enabling autofill on the Website (of the Username) during your subsequent visits on the Website
comment_author_email_	348 days	stores your e-mail address, enabling autofill on the Website (of the e-mail address) during your subsequent visits on the Website
comment_author_url_	348 days	stores your URL, enabling autofill on the Website (of the URL) during your subsequent visits on the Website

Using the appropriate options of your browser, you can, at any time:

- delete cookies,
- block the use of cookies in the future.

In these cases, we will no longer process them. More information on cookies is available on [Wikipedia](#).

EXTERNAL SERVICES / DATA RECIPIENTS

We use the services of external entities which support us in running our business. We entrust them with the processing of your data – these entities process data only on our documented command.

Below you will find a list of recipients of your data:

ACTIVITY	DATA RECEIVERS	DATA TRANSMISSION OUTSIDE THE EUROPEAN UNION
every action related to the Website	hosting provider	does not take place
	persons cooperating with us under civil law contracts, supporting our current operations	does not take place
using the Website with settings allowing for conducting marketing activities	entity providing marketing services	yes – United States **
using the Website with settings allowing for conducting analytical activities	entity allowing for conducting analytical activities on the website	yes – United States **
using services offered on the Website	accountancy office – with paid services	does not take place
	provider of business facilitating software (e.g., accounting software) – with paid services	does not take place
	payment provider – with paid services	does not take place
	provider of standard office software (including e-mail inboxes)	does not take place
	entity providing resources under cloud computing – with hosting services	does not take place
	entity enabling us to provide a registration service and maintaining an internet domain name	does not take place

subscription to the newsletter or consent to receive marketing messages	entity providing newsletter or marketing messaging services	does not take place
contacting us (e.g., making an inquiry)	provider of standard office software (including e-mail inboxes)	does not take place

In addition:

competent public authorities within the scope in which we are obliged to make data available to them

TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

** For the above reasons, your personal data may also be processed by entities outside the European Union. An adequate level of protection of data processing, including through the use of appropriate security measures, is ensured by the use of standard data protection clauses adopted by the European Commission, referred to in Article 46 (2) (c) of the GDPR.