

PRIVACY AND COOKIES POLICY
APPLICABLE AT OCCSON.COM

Dear Users,

In order to fulfill any obligations resulting from Regulation (EU) 2016/679 of the European Parliament and of the European 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 (general regulation on the protection of data, hereinafter "GDPR") hereby we present to you all sufficient information about scope and legal basis of proceeding your personal data, as well as our contact details, to help you understand how we will process your data and assure you, that we will provide sufficient and effective means to protect them.

I. Glossary

1. **User** – a party that uses the Website, which may involve any of the following: natural persons with full capacity to perform acts in law, legal persons and unincorporated business units with legal capacity assigned by specific legal regulations.
2. **Provider** – Tomasz Kowalewski, running business activities under the business name “Tomasz Kowalewski” with registered office in Kraków (30-347), ul. Kapelanka 12, Tax Id. No.: 9542491588, Industry Id. No.: 122978211.
3. **Website** – the website run by the Provider under the URL address occsn.com.
4. **Cookies** – small files sent by Provider to Users’ web browser that allow Provider to read certain information from Users’ device, e.g. whether User is using a computer or smartphone, which allows our software to display you respectively a computer or a mobile version. These files do not interfere with the functioning of Users’ device in any way.
5. **SSL protocol** – a special standard of encrypted online data transmission as opposed to standard transmission carried out via open text.
6. **System Log** – information sent to a server by the User’s computer at each connection potentially containing various data (e.g. IP number) allowing for the determination – with smaller or greater accuracy – from where the connection has been made.
7. **IP address** – an individual number usually held by each computer working online; the IP number can be either permanently linked with the given workstation (static IP) or assigned to it for the given connection (dynamic IP).
8. **GDPR** – the Regulation 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).
9. **Personal Data** – any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or

indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person..

10. **Processing** – any operations performed on the Personal Data, such as collecting, recording, storing, structuring, altering, sharing and erasing, especially the ones performed in any IT systems.

II. Personal Data

Data administrator

Pursuant to Art. 13 GDPR, we hereby inform you that the controller of your Personal Data is Provider.

You can contact Provider as follows:

- by letter to the address: ul. Kapelanka 12, 30-347 Kraków
- by e-mail: hello@occsn.com

Purposes and the legal basis for processing your personal data

Your Personal Data will be processed for the following purposes and based on the following legal grounds:

- processing in order to enable the use of the Website's functionalities and the creation of an account, pursuant to Art. 6 sec. 1 b) of the GDPR;
- processing is necessary for the purposes of Provider's legitimate interests, pursuant to Art. 6 sec. 1 (f) GDPR), which includes:
 - direct marketing of Provider's services;
 - taking any necessary steps connected with any possible claims due to Provider or against Provider.

Voluntary provision of personal data

The submission of the Personal Data is voluntary; however, if they are not provided, this will result in inability to register on the Website use its functionalities.

The period of storage of your personal data

Your Personal Data will be processed for the period of maintaining the account on the Website and subsequent to the deletion thereof to perform obligations prescribed by law, including in

particular the tax and accounting ones and to archive the data for the period provided for by the applicable law.

Any Personal Data that we process on the basis of our legitimate interest will be processed for as long as our interest exists, in particular for the period of limitation of any possible claims due to Provider or against Provider.

To the extent that we process your data on the basis of your consent, we will store it until you withdraw your consent to the processing of Personal Data. Withdrawal of consent does not affect the lawfulness of the processing of personal data carried out before the withdrawal of your consent.

Your rights related to the processing of Personal Data

Pursuant to **GDPR** you have the following rights related to the processing of your personal data:

- the right to withdraw consent (art. 7 (3) of the GDPR),
- the right to access your personal data (art. 15 of the GDPR),
- the right to request the rectification of your personal data (art. 16 of the GDPR),
- the right to request the deletion of your personal data (art. 17 of the GDPR),
- the right to request the restriction of the processing of your personal data (art. 18 of the GDPR),
- the right to transfer your personal data, i.e. the right to receive your personal data from us, in a structured, commonly used, machine-readable IT format; you can send this data to another data administrator or request that we send your data to another administrator, however, we will only do this if such a message is technically possible (art. 20 GDPR),
- the right to object to the processing of your data on the basis of our legitimate interest, which is not overriding your interest or your rights and freedoms, and the right to object to the processing of your data for direct marketing purposes (art. 21 of the GDPR).

To exercise the abovementioned rights, please contact us by e-mail: [·] or by traditional letter to the address: Tomasz Kowalewski, ul. Kapelanka 12, 30-347 Kraków.

You also have the right to lodge a complaint with the supervisory body dealing with the protection of personal data, i.e. the President of the Office for Personal Data Protection (Article 77 GDPR).

Recipients of your Personal Data

Provider will transfer your Personal Data to:

- IT system suppliers to whom Provider will commission services related to the processing of personal data;
- at the request of public authorities in accordance with the obligations arising from the generally applicable law.

Provider only transfer the data necessary for the proper performance of his services and only to the extent that results from the content of the contracts concluded with the abovementioned entities or others contracts concluded by them with any of their software or hardware suppliers, on terms and conditions providing the same level of protection (except for the last point). Thanks to this, Provider have full control over this data and he can ensure its security.

Transferring data outside the European Economic Area

Your Personal Data will not be transferred outside the European Economic Area.

Automated decision-making including profiling

Your Personal Data will not be subject to automated decision-making, including profiling.

III. Cookies

This website uses the following types of cookies:

- **"necessary"** cookies that enable the use of services available as part of the website pages, e.g. authentication cookies used for services that require authentication on the website, cookies that are used to ensure security, e.g. used to detect fraud in the field of authentication,
- **"performance"** cookies that enable the collection of information on the use of the website,
- **"functional"** cookies, which allow you to remember the settings of the website selected by the user and personalize the interface, e.g. in terms of the selected language or region, font size, website appearance, etc.,
- **"advertising"** cookies, which enable the provision of advertising content to the users of the website, tailored to their interests.

VI. System Logs' Operation on the Website

The Users' activity on the Website, including their personal data, are registered in the System Logs. Information gathered in the Logs is processed predominantly for the purposes related to the provision of the services, i.e.:

- for analytical and statistical purposes – to constantly improve the quality of the services provided as part of the Website and to adjust its functionalities to the Users’ needs. In this case, a legal basis for processing involves Provider’s legitimate interests consisting in analysing the Users’ activity and preferences;
- to detect abuse, to identify and counteract any threats to the Website’s stability and proper operation.

The data about each entry of the registered User is also registered. In such case the IP number, User agent and time of the session are stored. You can access that data in the “Sessions” tab in your User’s profile.

V. Cookies’ Operation on the Website

You can adjust the scope in which we can use Cookies on your device by yourself. You can do this by changing your browser settings. Remember, however, that many of the cookies we use are crucial for the proper display of the website and the content displayed on it, so blocking such cookies may disrupt the use of our services.

Detailed information on disabling cookies in individual browsers can be found by clicking on the appropriate browser below:

- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Internet Explorer](#)
- [Opera](#)
- [Safari](#)

If the Users do not want to receive the Cookies, they may change the relevant settings of their browsers. However, if the Cookies necessary for authentication processes, security purposes or for maintaining the User’s preferences are turned off, this might hinder, and in extreme cases also prevent, the use of the Website.

VI. Additional Information

The use of the Website is carried out via the secure SSL protocol which protects online data transmission.

We reserve the right to amend the above Privacy Policy by publishing a new Privacy Policy on our Website. Once amended, the Privacy Policy shall be released on the Website with a new date.

More information concerning terms of service, in particular rules governing operation of the Website, procedures and terms applicable to the conclusion of agreements, and terms of access to the Website's content and of use of the Website, are presented in the Terms of Service.