### Privacy Policy of the Website rokadoors.com

This Privacy Policy has been adopted pursuant to 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, "GDPR"; Official Journal of the European Union L 119/1 of 4.5.2016).

The primary objective of this Privacy Policy is to fulfill the information obligations set out in Articles 13 and 14 of the GDPR.

#### § 1. Definitions

Within the meaning of this Privacy Policy, the following terms shall be understood as:

- 1. We, ROKA, Administrator Mr. Robert Karasek, conducting business under the name ROKA Robert Karasek, NIP (Tax ID): 9372274974, REGON: 241790142, with the principal place of business located at ul. ks. Józefa Londzina 31, 43-382 Bielsko-Biała, Poland.
- 2. Rokadoors.com the website operated by ROKA, accessible at the domain: www. rokadoors.com.
- 3. You, User, Client natural persons whose personal data are processed by ROKA in connection with their use of rokadoors.com.

## § 2. Who is the data controller?

The Data Controller is the entity that determines the purposes and means of the processing of personal data. The Controller of your personal data is Mr. Robert Karasek, conducting business as ROKA Robert Karasek.

## § 3. Whose personal data do we process?

We process personal data of users of the website rokadoors.com in connection with our business operations. The scope of data processed is always appropriate and limited to the purposes of processing.

# § 4. What data do we collect via rokadoors.com and for what purposes?

The scope of data collected and the purposes of its processing depend on your use of the functionalities of rokadoors.com.

- 1. Browsing the website rokadoors.com
  - a. What data do we collect?
    - Data stored in server logs, where the user is identified by the URL address.
      This includes:
      - » time of request,

- » time of server response,
- » name of client station (identified via HTTP protocol),
- » information on HTTP transaction errors,
- » referrer URL (in case of redirection to rokadoors.com via a hyperlink),
- » browser details.
- » IP address.
- b. Purpose of processing:
  - Website administration and statistical analysis of traffic on rokadoors.com.
- c. Is providing data mandatory?
  - Voluntary, but necessary for proper website functionality.
- d. Legal basis for processing:
  - Performance of a contract for the provision of electronic services (Article 6(1)(b) GDPR),
  - Our legitimate interest (Article 6(1)(f) GDPR) ensuring proper display and availability of the website.
- e. Recipients of data:
  - Only when legally obliged or authorized. In particular:
    - » IT infrastructure or system providers,
    - » hosting service providers,
    - » subcontractors performing services under contract.
- f. Data retention period:
  - As long as necessary for contract execution or the duration of our legitimate interest, but no shorter than the period of website use.

Note: If the legal basis is legitimate interest, you have the right to object to further processing (see § 8).

- 2. Newsletter Subscription
  - a. Data collected:

Email address.

b. Purpose of processing:

For marketing purposes, including sending newsletters with information on our

offer, promotions, contests, loyalty programs, etc.

c. Is providing data mandatory?

Voluntary, but necessary to receive the newsletter.

d. Legal basis for processing:

Consent to receive marketing communications (Article 6(1)(a) GDPR), provided by completing the form and clicking the "Submit" button.

You can withdraw your consent at any time (e.g., by emailing: marketing@rokadoors.com), without affecting the lawfulness of prior processing.

- e. Recipients of data:
  - IT infrastructure providers,
  - hosting services,
  - subcontractors supporting newsletter delivery.
- f. Data retention period:

Until consent is withdrawn.

- 3. Contact Form
  - a. Data collected:
    - Data entered in the form, including:
      - » name and surname,
      - » email address.
      - » phone number,
      - » address,
      - » job title,
      - » content of your message.
  - b. Purpose of processing:
    - Responding to inquiries,
    - Establishing, pursuing, or defending against legal claims.
  - c. Is providing data mandatory?
    - Voluntary, but necessary to send a message and receive a response.
  - d. Legal basis for processing:

- Necessary to take steps prior to entering into a contract (Article 6(1)(b) GDPR),
- For business correspondence legitimate interest (Article 6(1)(f) GDPR),
- For commercial inquiries consent (Article 6(1)(a) GDPR).
- e. Recipients of data:
  - As in the cases above: IT service providers, hosting providers, subcontractors.
- f. Data retention period:
  - As long as necessary to respond and for the duration of our legitimate interest – but no shorter than the correspondence period.

You may object to processing based on legitimate interest (see § 8).

#### 4. Cookies

Details regarding cookies can be found in the Cookie Policy available at: www. rokadoors.com. The Cookie Policy constitutes Appendix 1 to this Privacy Policy.

## § 5.Do We Use Automated Decision-Making, Including Profiling?

We currently do not carry out any operations involving automated decision-making, including "qualified" profiling, which produce legal effects or significantly affect users. If such operations are implemented in the future, they will comply with Article 22 GDPR.

## § 6. Are Your Data Transferred Outside the European Economic Area (EEA)?

Currently, we do not transfer your data outside the EEA. Should this change in the future, we will ensure adequate safeguards, especially through the use of standard contractual clauses (SCC).

### § 7. What Rights Do You Have?

You may request the following, in particular:

- 1. Access to your data (including information on data processing and copies),
- 2. Rectification of inaccurate data,
- 3. Restriction of processing,
- 4. Erasure of data ("right to be forgotten"),
- 5. Data portability.

Requests may be submitted as described in § 11 and will be processed in accordance with Articles 15–20 GDPR.

### § 8.Right to Object

You have the right to object to processing based on our legitimate interest.

- 1. If for direct marketing we will cease such processing immediately.
- 2. If for other legitimate interests we will stop processing unless we demonstrate compelling legitimate grounds overriding your rights or for legal claims.

Objections may be submitted as described in § 11.

### § 9. Complaint to the Supervisory Authority

If you believe that your data is being processed unlawfully, you have the right to file a complaint with the President of the Personal Data Protection Office (PUODO). Contact details are available at: https://uodo.gov.pl/pl/p/kontakt.

### § 10. Availability and Updates

This Privacy Policy may be updated from time to time. The current version will always be available at: www.rokadoors.com

#### § 11. Contact Information

If you have any questions about how we process your personal data, you can contact us by phone, email, or post using the following details:

**ROKA Robert Karasek** 

ul. ks. Józefa Lodzina 31

43-382 Bielsko-Biała

tel. +48 33 497 00 78

e-mail: info@rokadoors.com

www.rokadoors.com