

WEBSITE PRIVACY POLICY

WWW.TRAXFAIR.COM

§ 1

GENERAL PROVISIONS

1. The administrator of the personal data collected via the www.traxfair.com website is TORNAT SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (TORNAT Ltd.) entered in the Register of Entrepreneurs by the REGISTRAR'S COURT GDAŃSK-PÓŁNOC IN GDAŃSK, VIII ECONOMIC DEPARTMENT OF THE NATIONAL REGISTER under the KRS number: 0000972974, NIP: 5862381014, REGON: 522200806, share capital: PLN 20,000, registered office and delivery address: Al. Zwycięstwo 245 / 9, 81-525 Gdynia, e-mail address: office@traxfair.com, phone number: **+48798831286**, hereinafter referred to as "Administrator".
2. Personal data collected by the Administrator through the website are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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), hereinafter referred to as **RODO**.
3. Any words or expressions capitalized in the body of this Privacy Policy shall be understood as defined in the Terms of Service of www.traxfair.com.

§ 2

TYPE OF PERSONAL DATA PROCESSED, PURPOSE AND SCOPE OF DATA COLLECTION

1. **PURPOSE OF PROCESSING AND LEGAL BASIS.** The Administrator processes the personal data of Service Recipients of www.traxfair.com in the case of:
 - 1.1. registration of an Account on the Website in order to create an individual account and manage that Account on the basis of Article 6(1)(b) of the RODO (performance of an agreement for the provision of services by electronic means in accordance with the Website Regulations),
 - 1.2. use of the Order Form available on the Site for the purpose of executing the Sales Agreement on the basis of Article 6(1)(b) of the RODO (execution of the agreement for the provision of electronic services in accordance with the Terms and Conditions of the Site),
 - 1.3. use of the Inquiry Form via the Service on the basis of Article 6(1)(b) of the RODO (performance of an agreement to provide electronic services in accordance with the Terms and Conditions of the Service),
 - 1.4. use of the Offer Form through the Service on the basis of Article 6(1)(b) of the RODO (performance of an agreement for the provision of electronic services in accordance with the Terms and Conditions of the Service).
2. **TYPE OF PERSONAL DATA PROCESSED.** The recipient shall provide, in the case of:

- 2.1. **Accounts:** email address, name, tax ID, company,
 - 2.2. **Order Form: Accounts:** email address, name, tax ID, company,
 - 2.3. **Inquiry Form: Accounts:** email address, name, tax ID, company,
 - 2.4. **Bid Form: Accounts:** email address, name, tax ID, company.
3. **ARCHIVING PERIOD OF PERSONAL DATA.** The personal data of Service Recipients are stored by the Administrator:
- 3.1. where the basis of data processing is the performance of a contract, for as long as it is necessary for the performance of the contract, and thereafter for a period corresponding to the period of limitation of claims. Unless a special provision provides otherwise, the statute of limitations is six years, and for claims for periodic benefits and claims related to the conduct of business - three years,
 - 3.2. where the basis for data processing is consent, for as long as the consent is not revoked, and after revocation of consent for a period of time corresponding to the statute of limitations for claims that the Administrator may raise and that may be raised against him. Unless a specific provision provides otherwise, the statute of limitations is six years, and for claims for periodic benefits and claims related to the conduct of business - three years.
4. When using the Site, additional information may be collected, in particular: the IP address assigned to the Customer's computer or the external IP address of the Internet provider, domain name, browser type, access time, type of operating system.
5. Upon separate consent, pursuant to Article 6(1)(a) of the RODO, data may also be processed for the purpose of sending commercial information by electronic means or making telephone calls for direct marketing purposes - respectively, in connection with Article 10(2) of the Act of July 18, 2002 on Providing Services by Electronic Means or Article 172(1) of the Act of July 16, 2004 - Telecommunications Law, including those directed by profiling, if the Service Recipient has given the appropriate consent.
6. Navigation data may also be collected from Service Recipients, including information about the links and references they choose to click on or other actions they take on the Site. The legal basis for such activities is the Administrator's legitimate interest (Article 6(1)(f) RODO) in facilitating the use of services provided electronically and improving the functionality of such services.
7. Provision of personal data by the Customer is voluntary.
8. The controller shall take special care to protect the interests of data subjects, and in particular shall ensure that the data it collects are:
- 8.1. processed in accordance with the law,
 - 8.2. collected for designated legitimate purposes and not subjected to further processing incompatible with those purposes,
 - 8.3. Substantially correct and adequate in relation to the purposes for which they are processed, and stored in a form that allows identification of the persons to whom they relate for no longer than necessary to achieve the purpose of processing.

§ 3

SHARING OF PERSONAL DATA

1. The personal data of Service Recipients are transferred to the service providers used by the Administrator in the operation of the Site, in particular to:
 - 1.1. Hosting providers,
 - 1.2. A software provider to enable the business,
 - 1.3. entities providing the mailing system,
 - 1.4. carriers,
 - 1.5. accounting office,
 - 1.6. The Service Recipient who published the Request/Offer to which the other Service Recipient wishes to respond,
 - 1.7. providers of electronic payment systems,
 - 1.8. The supplier of the software needed to run the website.
2. The service providers referred to in Section 1 of this paragraph, to whom personal data are transferred, depending on the contractual arrangements and circumstances, are either subject to the Administrator's instructions as to the purposes and means of processing such data (processors) or determine the purposes and means of processing themselves (controllers).
3. The personal data of Service Recipients is stored exclusively in the European Economic Area (EEA), subject to § 5.5 of the Privacy Policy.

§ 4

THE RIGHT TO CONTROL, ACCESS AND CORRECT THE CONTENT OF THEIR OWN DATA

1. The data subject has the right to access the content of his/her personal data and the right to rectification, erasure, restriction of processing, the right to data portability, the right to object, the right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.
2. Legal grounds for the Service Recipient's request:
 - 2.1. **Access to data** - Article 15 RODO.
 - 2.2. **Correction of data** - Article 16 of RODO.
 - 2.3. **Deletion of data (the so-called right to be forgotten)** - Article 17 of the RODO.
 - 2.4. **Restriction of processing** - Article 18 RODO.

2.5. **Data portability** - Article 20 of the RODO.

2.6. **Objection** - Article 21 RODO

2.7. **Withdrawal of consent** - Article 7 (3) RODO.

3. In order to exercise the rights referred to in paragraph 2, you can send a relevant email to: **office@traxfair.com**
4. In a situation where the Service Recipient makes a request under the above rights, the Administrator shall either comply with the request or refuse to comply with the request immediately, but no later than within one month after receiving it. However, if - due to the complex nature of the request or the number of requests - the Administrator is unable to comply with the request within one month, it will comply within another two months, informing the Service Recipient in advance - within one month of receipt of the request - of the intended extension of the deadline and the reasons for it.
5. If it is determined that the processing of personal data violates the provisions of the RODO, the data subject has the right to file a complaint with the President of the Office for Personal Data Protection.

§ 5

COOKIES

1. The Administrator's website uses "*cookies*".
2. Installation of "*cookies*" is necessary for the proper provision of services on the Website. The "*cookies*" files contain information necessary for the proper functioning of the website, and they also provide the opportunity to develop general statistics of website visits.
3. The site uses two types of "*cookies*": "session" and "permanent".
 - 3.1. "Session" "*cookies*" are temporary files that are stored on the final device of the Service Recipient until logging off (leaving the site),
 - 3.2. "Permanent" *cookies* are stored in the final device of the Service Recipient for the time specified in the parameters of the *cookies* or until they are deleted by the Service Recipient.
4. The Administrator uses its own cookies to better understand how Service Recipients interact with the content of the website. The files collect information about how a Service Recipient uses the website, the type of website from which the Service Recipient was redirected, and the number of visits and the time of the Service Recipient's visit to the website. This information does not record specific personal information about the Service Recipient, but is used to compile statistics on the use of the website.
5. The administrator also uses external cookies to collect general and anonymous statistical data via Google Analytics analytical tools (administrator of external cookies: Google LLC. based in the USA).

6. Cookies may also be used by advertising networks, in particular the Google network, to display advertisements tailored to the manner in which the Service Recipient uses the Site. For this purpose, they may retain information about the Service Recipient's navigation path or time spent on a particular page.
7. The Customer has the right to decide on the access of "cookies" to his computer by:
 - 7.1. selection of the types of cookies that it agrees to collect just after entering the Site and the cookie message appears,
 - 7.2. change the settings in your browser window. Detailed information about the possibility and methods of handling "cookies" is also available in the settings of your software (web browser).

§ 6

ADDITIONAL SERVICES RELATED TO USER ACTIVITY ON THE SITE

1. The Service uses so-called social plug-ins ("plug-ins") of social networks. When displaying the www.traxfair.com website containing such a plug-in, the Service Recipient's browser will establish a direct connection to Facebook, Instagram and TikTok servers.
2. The content of the plug-in is transmitted by the respective service provider directly to the recipient's browser and integrated into the website. Thanks to this integration, service providers receive information that the Client's browser has displayed the www.traxfair.com site, even if the Client does not have a profile with the given service provider, or is not logged in with him/her at the moment. This information (along with the Client's IP address) is sent by the browser directly to the provider's server (some servers are located in the USA) and stored there.
3. If the Client logs into one of the above-mentioned social networks, the service provider will be able to directly attribute the visit to www.traxfair.com to the Client's profile on the respective social network.
4. If the Service Recipient uses a particular plug-in, for example, by clicking on the "Like" button or the "Share" button, the corresponding information will also be sent directly to the server of the respective service provider and stored there.
5. The purpose and scope of data collection and its further processing and use by service providers, as well as the possibility of contacting and the rights of the Service Recipient in this regard and the possibility of making settings to ensure the protection of the Service Recipient's privacy are described in the service providers' privacy policies:
 - 5.1. <https://www.facebook.com/policy.php>
 - 5.2. https://help.instagram.com/519522125107875?helpref=page_content
 - 5.3. <https://www.tiktok.com/legal/page/eea/privacy-policy/pl>
 - 5.4. <https://policies.google.com/privacy?hl=pl&gl=ZZ>
6. If the Service Recipient does not want the social networks to attribute the data collected during the visit to www.traxfair.com directly to his/her profile on the respective website, he/she must

log out of the website before visiting www.traxfair.com. The recipient can also completely prevent plug-ins from loading on the site by using appropriate browser extensions, such as blocking scripts with "NoScript".

7. The administrator uses remarketing tools on his site, i.e. Google Ads. Their use involves the use of cookies from Google LLC. pertaining to the Google Ads service. As part of the mechanism for managing cookie settings, the Service Recipient has the ability to decide whether the Service Provider will be able to use Google Ads (administrator of external cookies: Google LLC. based in the USA) in relation to him.

§ 7

FINAL PROVISIONS

1. The Administrator shall apply technical and organizational measures to ensure the protection of the processed personal data appropriate to the risks and categories of protected data, and in particular shall protect the data from being disclosed to unauthorized persons, from being taken by an unauthorized person, from being processed in violation of applicable regulations, and from being altered, lost, damaged or destroyed.
2. The Administrator shall provide appropriate technical measures to prevent unauthorized persons from obtaining and modifying, personal data sent electronically.
3. In matters not regulated by this Privacy Policy, the provisions of RODO and other relevant provisions of Polish law shall apply accordingly.