

## **Privacy Policy**

We are aware that your personal data and the way they are used is not indifferent to you, so we want you to be sure that the company Global Parks Poland Sp. z o.o. ("Global") is cautious when obtaining your personal data.

We collect and process personal data in compliance with the requirements of Polish and European legislation, including 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). Processing of personal data is done for specific purposes and in compliance with applicable laws. This Policy is a manifestation of care for the rights of people visiting the website and using our services.

Please take a moment to familiarize yourself with our privacy practices and if you have any questions please contact us at the address indicated in the "Contact" section on our website or to the address provided in this Policy.

### **Who is the Administrator (the controller) of personal data?**

This Privacy Policy ("Policy") applies to personal data collected by Global in connection with our website, the services and products we offer. All personal data provided to or collected by Global is controlled by Global Parks Poland Sp. z o.o., ul. Fosa 41/11, 02-768 Warsaw ("Global").

References to "Global" in this Policy also apply to any company owned or controlled by it directly or indirectly, with which Global co-operates (hereinafter: "Global Group"). Find out more about the Global Group at [www.globalcityholdings.com](http://www.globalcityholdings.com)

This Policy also applies to the marketing content of Global, including offers and advertisements of Global products and services, which our company (or service provider acting on behalf of our company) displays on external websites, platforms and applications based on information about using of website by you.

See what your rights regarding the processing of your personal data are and how you can use them.

### **What is personal data and what personal data is collected?**

Personal data means any information that can be used to directly or indirectly identify a particular natural person.

We collect personal data from various sources. These are:

- Personal data provided to us directly, e.g. through contact forms, sending inquiries and emails, completing surveys, participating in contests,
- Personal data that we collect automatically, e.g. through cookies (for additional information check our cookie policy), through the tools on the Global's website used to measure and collect information about the session or by collecting technical information that help identify the device user to prevent fraud and for statistical and diagnostic purposes,
- Personal data that we collect from other sources, e.g. via the facebook page;

The above also includes personal data collected as part of marketing campaigns, lotteries and contests as well as through our websites and applications. Likewise you may be asked to provide your personal information when contacting our company.

You have no obligation to provide personal data to Global, however, in the even of failure to do so, our company may not be able to provide you with our products and services or answer your questions or complaints.

### **What is the purpose of collecting and processing of personal data?**

Personal data is collected and processed only for the implementation of specific purposes for which data is collected, e.g.:

- If you ask our company a question - to identify the questioner and to contact you and provide answers,
- If you declare the will to participate in the contest - to organize and conduct contests and promotions,
- If you make a complaint - to handle any complaints,
- In order to develop and improve our products, services and functionalities of our websites,
- In order to understand and identify interests and the changing needs of consumers.

If necessary, we will ask for your consent to the processing of personal data. After providing consent to the processing of your personal data you have the right to withdraw your consent at any time. However the withdrawal of such consent does not affect the lawfulness of processing based on consent before its withdrawal.

We also process your personal data when we have a legal obligation to perform such processing (e.g. tax or social security obligations). The above also applies to situations where processing is necessary to defend the rights of our company - for example in court proceedings.

**What are the grounds for processing of personal data?**

<b>Examples of the purpose of personal data processing.</b>	<b>Legal basis</b>
providing electronic services in the scope of sharing content collected on the website and in the Global’s service,	Point b of Article 6 (1) of GDPR – the legal basis is the necessity of processing to execute a contract,
providing information about the service or product order / performance of the concluded contract,	Point b of Article 6 (1) of GDPR - necessity resulting from the contract - we use personal data to perform obligations under a contract (e.g. delivery of the ordered product, handling complaints, etc.).
sending information about products and services, special offers and discounts;	Point f of Article 6 (1) of GDPR – legally legitimate interests - we use personal data to send such information. In some cases (for example, if required by law), we will ask for permission to process your personal data before sending such information.
enabling, personalizing the use of our digital services provided through our website and applications;	Point f of Article 6 (1) of GDPR – legally legitimate interests - we use personal data to customize the experience of using our digital services to your needs.
response to claims against us,	Point f of Article 6 (1) of GDPR – legally legitimate interests - we use personal data to respond to any claims against us. In some cases, we may also be required to disclose personal information under applicable law (for example, in connection with proceedings before a court).

### **How long we store your personal data ?**

Under applicable provisions of law we may store your personal data no longer than it is necessary to achieve the purposes for which we use it. The period for which we store your personal data will be determined based on a number of criteria including the purposes for which we use data, the amount and sensitivity of data, the potential risks related to unauthorized use or disclosure of data and our obligations under the law.

### **Who can we share personal data with?**

The data may be disclosed to external service providers, in particular which provide Global with marketing and promotional services as well as to fulfill your requests, answer questions, fulfill orders, allow participation in promotions or provide various other functions, services and materials through our websites. Therefore, we share your personal data with external service providers acting on our behalf, such as companies that host or operate Global websites, analyze data, provide customer service, provide postal or delivery services as well as with sponsors or other external entities who participate in or manage our promotions.

We may also transfer your personal data to third parties if we are required to disclose or share such data to comply with any legal requirements.

The entities to which the data will be disclosed may use the personal data entrusted to them only for specific purposes defined by Global, your personal data will not be used by those entities in any other way.

Personal data will, in principle, not be transferred outside the European Economic Area ("EEA"). Global may transfer personal data outside the EEA only when it is necessary and with an adequate level of protection, primarily through:

- cooperation with entities that process personal data in countries for which an appropriate decision of the European Commission has been issued,
- use of standard contractual clauses issued by the European Commission,
- applying binding corporate rules, approved by the competent supervisory authority,
- in the case of transfer of personal data to the USA - cooperation with entities participating in the Privacy Shield program, approved by the decision of the European Commission,

## **What rights do you have ?**

You have the right to apply to our company with the request to:

- confirm what kind of personal data we store about you and provide a copy of this data;
- correct any improper personal data;
- cease to use personal data, unless we provide a reasonable reason for which we must continue to store such data, e.g. to protect Global rights until the limitation period has expired;
- remove personal data if there is no valid reason for their further storage;
- provide your personal data in a structured and widely used electronic format or send such information directly to another company if it is technically possible – in case we use personal data on the basis of your consent or because it is necessary to perform the contract concluded with you;

In addition, you have the right to submit a complaint related to the processing of your personal data to the supervisory authority. You have the right to submit a complaint directly to the local supervisory authority regarding the processing of personal data, from 25/05/2018 the competent authority is the Office for Personal Data Protection.

## **How to contact us ?**

To update your data or request information regarding the processing of personal data, or to contact us in any other matter regarding the protection of personal data, you can write to us at [IOD@parkofpoland.com](mailto:IOD@parkofpoland.com).

## **Can this Policy be changed ?**

Global may change the Policy in the future, among others for the following important reasons:

1. changes in the binding provisions of law regarding the protection of Personal Data, services provided electronically and those regulating consumer rights, affecting the rights and obligations of the administrator (controller) of personal data or the rights and obligations of the data subject;
2. adjusting the content of the Policy to new solutions and functionalities.

Global will each time place information with the new content of the Policy on the website.