

The text below should appear under the 'Privacy Policy' tab

PRIVACY POLICY

This Privacy Policy (hereinafter: Privacy Policy) contains information on the the processing your personal personal in in connection with your use of the website operating at: <https://wrm.wagrowiec.eu/> (hereinafter: the website).

1. Information about the Controller of your personal data

The controller of your personal data is Zakład Komunikacji Miejskiej Sp. z o.o. in Wągrowiec, ul. Skocka 18, 62-100 Wągrowiec, registered with the District Court in Poznań – Nowe Miasto i Wilda in Poznań, 9th Commercial Division of the National Court Register under No. 0000079295, NIP 7661808889, REGON 572050207

hereinafter referred to as the “Personal Data Controller” or “PDC”

2. Contacting the Data Controller

For any matters relating to the protection of personal data and this Privacy Policy, you may contact the Data Controller via:

- **email address:** zkm@zkmwagrowiec.pl
- **in writing:** Zakład Komunikacji Miejskiej Sp. z o.o. in Wągrowiec, 18 Skocka Street, 62-100 Wągrowiec

3. Purposes and legal basis for data processing:

Purpose of processing	Personal data	Legal basis
Account creation	<ul style="list-style-type: none">• email address,• telephone number.	Article 6(1)(b) of the GDPR - processing is necessary for the performance of a contract to which the data subject is party, i.e. in this case, creating an account necessary to use the Wągrowiecki City Bike (WRM) service.

Purpose of processing	Personal data	Legal basis
Conclusion of a contract	<ul style="list-style-type: none">• email address,	Article 6(1)(b) of the GDPR

	<ul style="list-style-type: none"> • telephone number. 	<p>- processing is necessary for the performance of a contract to which the data subject is a party, i.e. in relation to the conclusion and performance of a contract entered into following acceptance of Terms and Conditions of the Wagrowiec City Bike (WRM).</p>
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Purpose of processing	Personal data	Legal basis
Analysis of your activity on the website.	<ul style="list-style-type: none"> • IP address, • date and time of website visit, • type of operating system, • time spent on the website, • subpages visited, • other data collected by Google Analytics. 	<p>Article 6(1)(f) of the GDPR</p> <p>- processing is necessary for pursuing the legitimate interests of the data controller, which in this case is to understand your activity on the website.</p>

Purpose of processing	Personal data	Legal basis
Archival and evidential purposes.	<p>User user website :</p> <ul style="list-style-type: none"> • first name and surname, • email address, • telephone number, • message content, • other necessary details. 	<p>Article 6(1)(f) of the GDPR</p> <p>- processing is necessary for pursuing the legitimate interest of the data controller, which in this case is the safeguarding of information that may serve to demonstrate facts of legal significance.</p>

Purpose of processing	Personal data	Legal basis
Establishment, pursuit or defence against claims.	<p>User user website :</p> <ul style="list-style-type: none"> • first name and surname, • email address, • telephone number, • message content, • other necessary data. 	<p>Article 6(1)(f) of the GDPR</p> <p>- processing is necessary for pursuing the legitimate interests of the data controller, which in this case is the protection of the data controller's financial interests.</p>

Purpose of processing	Personal data	Legal basis
Fulfilment of obligations under the GDPR.	User user website : <ul style="list-style-type: none"> • first name and surname, • email address, • telephone number, • message content, • other necessary data. 	Article 6(1)(c) of the GDPR - processing constitutes a legal obligation incumbent upon the data controller.

4. Obligation to provide us with your personal data

- You are not obliged to provide us with your personal data. Providing personal data is voluntary and depends on your decision. However, providing certain personal data is necessary to meet your expectations, e.g. in order to contact the Data Controller.
- Please note that if you contact us regarding any matter, providing your data may be necessary, for example, to answer your question.

5. Data profiling and automated decision-making

Please be advised that we will not use your data for automated decision-making, including profiling.

6. Recipients of personal data

Like most businesses, we use the services of other entities in our operations, which often involves the need to transfer personal data. Consequently, where necessary, we may transfer your data to external service providers.

The external service providers involved in the processing of your personal data are:

- **Hosting companies** that store data on a server,
- **Entities providing technical services**, where technical work relates to areas in which personal data is located,
- **Legal service providers**, who are bound by professional secrecy and gain access to personal data as a result of the need to seek legal assistance,
- **Other subcontractors** who will have access to the data if necessary.

In addition, it may happen that, for example, on the basis of a relevant legal provision or a decision by the competent

In addition to the relevant authority, we may also need to disclose your personal data to other entities, whether public or private. For our part, we assure you that we examine every request for access to personal data very carefully and thoroughly to ensure that we do not inadvertently disclose information to an unauthorised person.

7. Transfer of data to third countries

Yes. As the Data Controller uses popular services (including Facebook, Instagram, TikTok, X and YouTube), your personal data may be transferred to the USA. For our part, we ensure that data will be transferred in compliance with all legal requirements. The providers of these tools guarantee an adequate level of personal data protection through appropriate compliance mechanisms provided for by the GDPR, in particular through the use of standard contractual clauses.

8. Retention period for personal data

Please note that in accordance with applicable law, we do not process your personal data “indefinitely”, but for the time necessary to achieve the specified purpose. After this period, your personal data will be permanently deleted or destroyed.

A description of the processing periods can be found below:

- **Account creation** – data related to account creation will be processed for the duration of the account’s activity,
- **Conclusion of a contract** – data relating to the conclusion of a contract will be processed for the duration of the contract between us,
- **Handling correspondence** – data relating to the handling of correspondence will be processed for the duration of the correspondence between us,
- **Analysis of website activity** – data relating to the analysis of website activity will be processed until it becomes out of date or loses its usefulness, but for no longer than 2 years,
- **Archival and evidential purposes** – data related to archival and evidential purposes will be processed until you effectively object or the purposes of processing are achieved,
- **Establishment, pursuit and defence of claims** – data relating to claims will be processed until the claims become time-barred, although the limitation period for claims may vary under applicable law;
- **Compliance with obligations under the GDPR** – data relating to the protection of personal data will be processed until it is no longer relevant, you have successfully lodged an objection, or the limitation period for our liability as a Data Controller has expired.

9. Your rights in relation to the processing of your personal data

Please be advised that, under the GDPR, you have the right to:

- access your personal data;
- rectify your personal data;
- erase your personal data;
- restrict the processing of your personal data;
- object to the processing of your personal data;
- to have your personal data transferred;
- lodge a complaint with a supervisory authority (if you believe that we are processing data unlawfully, you may lodge a complaint in this regard with the President of the Office for Personal Data Protection or another competent supervisory authority).

As the Data Controller, we respect your rights under data protection legislation and strive to facilitate their exercise to the greatest extent possible. Please note that the rights listed at are not of an absolute nature, and therefore in certain situations we may lawfully refuse to comply with your request. However, if we refuse to comply with a request, it is only after careful consideration and only where such refusal is necessary.

10. Policy update

We may amend this Privacy Policy, in particular in response to technological developments and changes in applicable legislation. You will be notified of any changes made to this Privacy Policy in a manner appropriate to the method of data processing. This Privacy Policy is effective from 4 June 2024; furthermore, all archived versions of the Privacy Policy will be linked below.