



## PRIVACY POLICY

### 1. WHAT IS THE PRIVACY POLICY?

We would like to familiarise you with the details of how we process your personal data to give you full **knowledge and comfort** in using the Enelion App.

As we operate in the Internet business ourselves, we know **how important it is to protect your personal data**. Therefore, we make every effort to protect your privacy and the information you share with us.

At Enelion, **we minimise** the amount of personal data we need to process - we do not want to know more about you than is absolutely necessary.

We carefully select and apply appropriate technical measures, in particular programming and organisational measures, to ensure protection of the processed personal data.

In our Privacy Policy you will find **all the essential information** regarding our processing of your personal data.

Please read it, we promise that it will not take more than a few minutes.

### 2. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The Controller of your personal data is:

**Enelion sp. z o.o.** with its registered office in Gdańsk, ul. Pana Tadeusza 50, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court Gdańsk-Północ in Gdańsk, 7th Commercial Division of the National Court Register, under KRS number: 0000547074, tax ID no. (NIP): 5833176978, share capital: PLN 13,200; e-mail address: [rodo@enelion.pl](mailto:rodo@enelion.pl).

### 3. HOW CAN YOU CONTACT US?

Regarding your personal data, you can **contact us** via:

- e-mail: [rodo@enelion.pl](mailto:rodo@enelion.pl)
- traditional mail: ul. Pana Tadeusza 50, 80-123 Gdańsk

### 4. WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSES?

The Enelion app offers a number of different services for which we process various personal data, based on different legal bases.

A detailed summary of the purposes of processing your personal data and the basis for such processing is provided below.

#### **4.1. Account registration in the App**

Personal data: e-mail address, telephone number, data about your devices (serial and identification numbers, device location)

Purpose of processing: conclusion and performance of the service contract

Legal basis: Article 6(1)(b) GDPR, i.e. processing for the purpose of taking action at your request prior to entering into a contract and data processing necessary for the performance of a contract to which you are a party and Article 18 of the Electronic Service Provision Act

Data retention time: until you delete your account in the Application

#### **4.2. Direct marketing of our own goods and services, including remarketing**

Personal data: e-mail address, telephone number, data about your devices (serial and identification numbers, device location)

Purpose of processing: direct marketing of own goods and services

Legal basis: Article 6(1)(f) of the GDPR, i.e. processing for the purposes of pursuing our legitimate interest in direct marketing of our own services, including remarketing

Data retention time: until you object to the processing of your personal data or you delete your account in the Application

#### **4.3. Responding to enquiries, processing complaints and reports of defects and errors in the Application**

Personal data: full name, e-mail address, telephone number, address for correspondence

Legal basis: Article 6(1)(f) GDPR, i.e. processing on the basis of our legitimate interest in improving the level of service provided, building positive customer relationships

Purpose of processing: handling complaints and reports of defects and errors in the Application, answering questions

Data retention time: until the expiry of 30 days from the date on which you submit a complaint or request or until we receive an enquiry from you

#### **4.4. Establishing, investigating and enforcing claims and defending claims before courts and other state authorities**

Personal data: full name, e-mail address, telephone number, home address

Legal basis: Article 6(1)(f) GDPR, i.e. processing based on our legitimate interest in establishing, pursuing and enforcing claims and defending against claims in proceedings before courts and other state authorities.

Legal basis: establishing, investigating and enforcing claims and defending claims before courts and other state authorities

Data retention time: until the expiry of the period of limitation for claims under relevant laws.

**5. VOLUNTARY PROVISION OF PERSONAL DATA**

The provision of the required personal data is voluntary, but is a contractual prerequisite for us to provide our services to you, i.e. to enable you to register an account in the App.

**6. PERSONAL DATA RECIPIENTS**

Recipients of your personal data may be, in particular: IT service providers or other persons providing consultancy services to us (e.g. law firms).

**7. INFORMATION ON AUTOMATED DECISION-MAKING, INCLUDING PROFILING**

Your personal data **shall not** be used for profiling or any automated decision-making.

**8. WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EEA OR TO AN INTERNATIONAL ORGANISATION?**

We do not transfer your personal data outside the EEA or to an international organisation.

**9. WHAT RIGHTS DO YOU HAVE IN RELATION TO OUR PROCESSING OF YOUR PERSONAL DATA?**

Under GDPR, you have the right to:

- request access to your personal data
- request rectification of your personal data
- request deletion of your personal data
- request limitation of processing of your personal data
- object to the processing of your personal data
- request transfer of your personal data

You can submit the above requests to: [rodo@enelion.pl](mailto:rodo@enelion.pl)

If you submit any of the above-mentioned requests to us, we will inform you without undue delay - and in any case within one **1 month** of receipt of the request - about the actions taken with regard to your request.

If necessary, we may extend the one-month period by a further two months because of the complexity of the request or the number of requests.

In any event, we will inform you of the extension within one month of receipt of the request and give you the reasons for the delay.

**10. LODGING A COMPLAINT WITH THE SUPERVISORY AUTHORITY**

If you believe that the processing of your personal data breaches personal data protection regulations, you have the **right to lodge a complaint** with the supervisory authority, in particular in the member state of your habitual residence, your place of work or the place where the alleged breach took place.

In Poland, the supervisory authority for GDPR is the **President of the Office for Personal Data Protection**.

For more information about complaints, visit: <https://uodo.gov.pl/pl/83/155>