

## **PRIVACY POLICY**

### **CONCERNS USERS VISITING THE WEBSITE**

<https://klaster-fotoniki.pl>

In relation to implementation, that started on 25<sup>th</sup> of May 2018, of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> of 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), hereinafter referred to as "GDPR" (OJ EU L of 4<sup>th</sup> of May 2016) on the basis of Article 13 of the GDPR, we are providing you below with information on our processing of your personal data.

#### **1. PERSONAL DATA**

##### **CONTROLLER**

The Controller of your personal data within the meaning of the personal data protection regulations is Polskie Centrum Fotoniki i Światłowodów with its registered office in Lublin (20-061) ul. Stanisława Dubois 6/3, registered by the District Court Lublin-Wschód in Lublin with its registered office in Świdnik, 6th Commercial Division of the National Court Register, KRS No.: 0000439169, NIP: 5170360711, REGON: 180910225 (hereinafter "Controller"). The Controller is the founder and coordinator of the Photonics and Optical Fiber Cluster.

The Controller reserves the right to introduce changes to the Privacy Policy.

##### **PURPOSES, CATEGORIES OF YOUR DATA AND BASIS OF PROCESSING**

We process your data on the basis of our legitimate interest (Article 6(1)(f) of the GDPR), which includes:

1. managing of the Website,
2. ensuring the safety of the Website and other users,
3. conducting statistical analyses,
4. conducting direct marketing of Controller products or services,

5. sending newsletter to e-mail addresses provided by the Users, for receiving of which Users have subscribed to via form,
6. responding to inquiries received from users via the contact form to the e-mail addresses provided by users,
7. meeting the legal obligations that arise from the GDPR to exercise your rights and therefore archiving your requests to us or informing you about threats to your privacy.

## **RIGHTS**

The GDPR grants you the following potential rights related to the processing of your personal data:

- The right to access your personal data,
- The right to rectify personal data,
- The right to delete personal data,
- The right to restriction of processing of personal data,
- The right to object to the processing of personal data,
- The right to data portability,
- The right to lodge a complaint with a supervisory authority,
- The right to withdraw consent to the processing of personal data if such consent was given.

The rules related to the exercise of the indicated rights are described in detail in Articles 15 - 21 of the GDPR. If you think that we have violated the rights of personal data protection while processing your personal data, you have the right to lodge a complaint with the supervisory body that is President of the Office for Personal Data Protection [pol. Prezes Urzędu Ochrony Danych Osobowych], Stawki 2, 00 193 Warsaw.

You can also always ask us to provide you with information about what data about you are stored and what is the purpose of processing it by us. In order to do so you shall send a message to [biuro@klaster-fotoniki.pl](mailto:biuro@klaster-fotoniki.pl) . This e-mail address may also be used if you have any questions about the processing of your personal data. Your questions, queries and requests will be recognized without undue delay, at the latest within one month of receipt of such. If necessary, we will extend this period by two months due to the complexity of the request or

due to a significant number of requests. You will then be informed of the extension and the reasons behind it within one month of receipt of the query or request.

### **SAFETY**

We guarantee to keep confidential any personal data provided to us. We ensure that all measures concerning the security and personal data protection are taken as indicated by the regulations on personal data protection. Personal data is collected with due diligence and accurately protected against access by unauthorized persons.

All entities to whom we entrust the processing of personal data, guarantee the application of appropriate measures to protect and secure personal data required by law.

Your personal data may be transferred to authorized state authorities in connection with the proceedings conducted by them, at their request and after meeting the conditions confirming the necessity of obtaining such data from the Controller.

Your personal data may also be transferred outside the European Union (to third countries). In such case, data will be transferred to recipients who have signed up to the "Privacy Shield" agreement or to those who guarantee data security. The list of entities that have signed up to the Privacy Shield can be found at the link: <https://www.privacyshield.gov/list>.

Due to the use of services of Google, Facebook, Twitter or LinkedIn, your data may be transferred to a third country in connection with their storage on servers outside the EU. These entities have joined the Privacy Shield program, apply the compliance mechanisms enumerated in the GDPR or standard contractual clauses.

We will not process your data by automated means, including profiling.

### **PURPOSES AND PROCESSING ACTIVITIES:**

#### **CONTACT VIA THE CONTACT FORM AND EMAIL CONTACT**

When contacting us via the contact form and by e-mail, you provide us with your e-mail. In addition, you may also include other personal data in your message.

In this case, your data is processed for the purpose of contacting you and the basis for processing it is Article 6(1)(a) of the GDPR, e.g. your consent resulting from initiating contact with us. The legal basis for the processing after the contact is a legitimate interest in the form of archiving correspondence for internal purposes (Article 6(1)(f) of the GDPR).

The content of the correspondence may be subject to archiving and we are not able to clearly determine when it will be deleted. You have the right to demand the history of your correspondence with us (if it has been archived) as well as to demand its deletion, unless its

archiving is justified by our overriding interests, e.g. defending against potential claims on your part.

## SOCIAL MEDIA

The Controller is also the Controller of your personal data on the Facebook fanpage as well as on Instagram and LinkedIn profiles. Your personal data will be processed for the purpose of administering and managing your fanpage or profile, communicating with you, directing promotional and marketing content to you, and creating communities on the profile.

The basis for the processing of your personal data is your consent, which you give by voluntarily observing or joining your profile. The rules on the fanpage or of the profile are set by the Controller, and the rules of using each social networking site result from its regulations. You can stop observing a given profile or fanpage at any time.

The Controller sees your personal data uploaded on your profile as public, such as your name, surname. Processing of other personal data is carried out by the social network and under the terms of its regulations.

Your personal data will be processed for the period of maintaining the profile on a given social media portal or for the period of Fanpage existence. They are processed based on your consent or in order to achieve legally justified interests of the Controller (marketing purposes).

Your data may be transferred to third countries in accordance with the regulations of a given social media portal. Facebook Inc. and LinkedIn Corporation have joined the Privacy Shield.

## NEWSLETTER

Newsletter is a free service provided electronically by the Controller, which relates to sending electronic letters that the Controller uses to inform about news, events, etc., in order to achieve the Controller's legally justified goal that is direct marketing.

When subscribing to our newsletter, you shall fill in your name and e-mail address in the newsletter subscription form. By subscribing, you confirm that you accept this Privacy Policy and that you agree to receive marketing and commercial information from us by means of electronic communication (e-mail) within the scope of the Act of 18 July 2002 on the provision of electronic services.

By subscribing to the newsletter, you also agree to our use of telecommunications terminal equipment (computer, tablet) for direct marketing of the Controller's products and services and to present commercial information in accordance with Article 172(1) of the Telecommunications Law.

The above consent is voluntary, although it is necessary to receive the newsletter. Consent may be withdrawn at any time.

The newsletter is sent beginning with the moment of activation until your objection to the processing of your personal data is filed, withdrawal of consent expressed on the basis of the Act on the provision of electronic services and Telecommunications law, or until the newsletter is ceased permanently. After withdrawal of consent, your data may be stored for up to 2 years in order to defend against possible claims, in order to show your consent to receive the newsletter, time of its withdrawal, the number of newsletters received, activity, etc., which all constitutes a legitimate interest of the Controller (Article 6(1)(f) of GDPR).

Mailing system records activity and actions taken by you in connection with the newsletter.

## **2. COOKIES**

Our website, like almost all other websites, uses cookies to provide you with the best user experience.

Through most browsers you can check whether cookies were installed on your device, as well as delete installed cookies and block the installation of cookies by the website in the future or other sites. However, removing or blocking cookies may cause problems with using the website. More information about deleting, modifying, or blocking cookies can be found on <http://www.cookiecentral.com/faq/>.

Cookie files enable the use of the website. In accordance with international NAI standards (<https://www.networkadvertising.org/>), Controller stores them for up to five years.

Moreover, Controller uses information contained in the cookie files for analytical purposes, e.g. to count the number of visits to the Site. Information contained in them is for statistical purposes only and Controller does not use them to identify you.

### **STATISTICS**

We use cookies to track the site's statistics, such as the number of visitors, the type of operating system and browser used to browse the site, time spent on the site, subpages visited, the site from which the visitor came to our site, etc. We use Google Analytics in this respect, which involves the use of Google LLC cookies to analyze the activities and behavior of website users. We base this on our legitimate interest - the creation and use of statistics, which then allows us to improve services and optimize the website. As part of the use of Google Analytics Controller does not process any user data that would enable the user's identification.

As part of the mechanism for managing the cookie settings, you have the possibility to decide whether we can use the marketing functions of Google Analytics.

You can find more information about this at:  
<https://support.google.com/analytics#topic=3544906> .

## SOCIAL MEDIA

On our website we use plugins that redirect to the websites of external providers, i.e. owners of social networking sites such as Facebook, Instagram and LinkedIn.

We have no influence on the data processed by these websites. As soon as you click on the button of the plugin that refers to social media, your personal data is processed by the social network (Facebook, Instagram and LinkedIn), which becomes their Controller and decides on the purposes and scope of their processing. Cookies left by these plugins can also be applied on the user's device when he or she accesses the site and then associated with the data collected by the social media portal. We have no control over the processing of data by these portals in the manner described above.

## SERVER LOGS

Using the site involves sending queries to the server where the site is stored. Each query addressed to the server is saved in the server logs.

The logs include, among others, your IP address, date and time of the server, information about your web browser and operating system you are using. The logs are saved and stored on the server.

The data stored in the server logs are not associated with specific people using the site and are not used by us to identify you.

Server logs are only auxiliary material used to administer the site, and their content is not disclosed to anyone except those authorized to administer the server.

Date of last update: 09.12.2020