Privacy Policy and Cookie Policy

The following information is provided for the purpose of being transparent about the processing of your personal data. Your personal data is administered by **Silfra sp. z o.o. sp. k**. with its registered office at Tytusa Chałubińskiego 9 lok. 2, 02-004 Warsaw, NIP: 521-381-20-55 REGON: 368357040, KRS: 0000717386, District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register.

We process your personal data primarily for purposes related to your use of our website, such as managing your user account, placing orders and managing contracts, processing complaints and returns, fulfilling tax obligations, sending newsletters, handling claims, analysis, statistics, marketing, etc. Your personal data will be processed for the period necessary to achieve the individual purpose. You have the right to access your personal data, rectify them, delete them or limit their processing, object to their processing, and to data portability. Additionally, you may lodge a complaint with the President of the Personal Data Protection Office.

Detailed information about the processing of your personal data can be found in the rest of the Privacy Policy.

 # 1: WHO IS THE DATA CONTROLLER? 2

 # 2: WHO CAN YOU CONTACT REGARDING THE PROCESSING OF PERSONAL DATA? 2

 # 3: FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA? 2

 # 4: WHAT INFORMATION DO WE HAVE ABOUT YOU? 7

 # 5: WHAT ARE "ANONYMOUS INFORMATION"? 7

 # 6: WHERE DO WE GET YOUR PERSONAL DATA FROM? 8

 # 7: ARE YOUR DATA SECURE? 8

 # 8: HOW LONG WILL WE KEEP PERSONAL DATA? 8

 # 9: WHO ARE THE RECIPIENTS OF PERSONAL DATA? 10

 # 10: DO WE TRANSFER DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS? 11

 # 11: DO WE USE PROFILING? 11

 # 12: WHAT ARE YOUR RIGHTS? 11

 # 13: DO WE USE COOKIES AND WHAT ARE THEY? 12

 # 14: ON WHAT BASIS DO WE USE COOKIES? 13

 # 15: CAN YOU DISABLE COOKIES? 13

 # 16: FOR WHAT PURPOSES DO WE USE OUR OWN COOKIES? 13

 # 17: WHAT THIRD-PARTY COOKIES ARE USED? 13

 # 18: DO WE TRACK YOUR BEHAVIOR ON THE WEBSITE? 14

 # 19: DO WE TARGET YOU WITH ADVERTISING? 14

 # 20: HOW CAN YOU MANAGE YOUR PRIVACY? 14

 # 21: IS THERE ANYTHING ELSE YOU SHOULD KNOW? 14

 # 22: CAN THIS PRIVACY POLICY BE CHANGED? 14

ANNEX TO THE PRIVACY POLICY ..... BŁĄD! NIE ZDEFINIOWANO ZAKŁADKI.

If you have any doubts or questions regarding the Privacy Policy, you can always contact us by sending a message to contact@silfra-consulting.com.

 # 1: Who is the administrator of personal data?

The administrator of your personal data is Silfra sp. z o.o. sp. k. at ul. Tytusa Chałubińskiego 9 lok. 2, 02-004 Warsaw, NIP: 521-381-20-55 REGON: 368357040, KRS: 0000717386, District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, share capital of 5,000 PLN fully paid up. This Privacy Policy applies to websites in the silfra-consulting.com domain.

Regarding profiles on social media related to our website, in accordance with the rulings of the Court of Justice of the European Union, the social media service provider is a joint administrator of personal data together with the administrator of the given profile. Details regarding the processing of personal data by individual social media service providers can be found here:

- LinkedIN,

 # 2: Who can you contact regarding the processing of personal data?

As part of the implementation of a personal data protection system in our organization, we have decided not to appoint a Data Protection Officer as it is not mandatory in our situation.

For matters related to personal data protection and privacy in general, you can contact us at the email address contact@silfra-consulting.com. Regarding social media, you can also directly contact the administrators of the social media platforms where we have our profiles.

 # 3: What are the purposes for which we process personal data?

There are more than one purpose. Below is a list of them, along with a more detailed explanation. We have also assigned appropriate legal bases for processing to individual purposes:

Purpose of processing	Purpose of processing explanation	Legal basis
Fulfillment of orders and contract management.	When placing an order, you must provide the necessary data for its implementation as specified in the order form. Providing data is a condition for placing an order. In addition, the system used to process the order also records your IP address from which you placed the order. Each order is saved in the database, which means that your personal data assigned to the order also includes information about the order, such as the date and time of placing the order, the order identification number, transaction identifier, order item, price, payment method and deadline, as well as the date and time of download (in the case of digital content). In connection with the conclusion of the contract, we may also process your other personal data to perform the services provided for in the contract that has been concluded. The scope of this data depends on which personal data is necessary to perform the contract. In a situation where we receive your data in the course of performing the contract, e.g. from the entity that employs you, we base such data processing on a legitimate interest, which in this case is to ensure efficient and effective service for the concluded contract. In such a case, we may process your identifying and contact information.	art. 6 ust. 1 lit. b RODO, art. 6 ust. 1 lit. f RODO

	Data is processed for the purpose of concluding and performing the contract. After the contract is performed, the data is stored in the archive for the purpose of potential establishment, investigation or defense of claims related to the contract. The data also goes to the accounting documentation for the purpose of fulfilling tax obligations.	
Actions taken to complete orders by customers.	Due to the fact that some customers start placing an order, but do not finalize it (do not confirm the order and do not enter into an agreement with us), we can take actions that will encourage our customers to complete the purchase process. To this end, we may, for example, send e-mails containing information about the unfinished order and an encouragement to finalize the transaction. For the purposes of these actions, we may process personal data, such as information provided during the order placement process, in particular your name and email address, as well as information about the contents of the cart, the date of the transaction start, and other data left in connection with the initiated purchase process. The legal basis for processing your personal data is Article 6(1)(b) of the GDPR, as these actions are aimed at concluding a contract. In addition, we find the basis for processing in our legitimate interest, which in this case is increasing sales.	art. 6 ust. 1 lit. b RODO, art. 6 ust. 1 lit. f RODO
Handling complaints or withdrawal from the contract.	If you submit a complaint or withdraw from a contract, you provide personal data included in the content of the complaint or statement of withdrawal from the contract. Providing data is a condition for submitting a statement of withdrawal from the contract or complaint. The data is processed in order to handle the process of withdrawal from the contract or complaint process. After completing such a process, the data is transferred to the archive for the purpose of possible determination, investigation or defense of claims related to the handling of the process of withdrawal from the contract or complaint process. The data also goes to the accounting documentation for the purpose of fulfilling tax obligations.	Art. 6 ust. 1 lit. c RODO w zw. z właściwymi przepisami dotyczącymi prawa do odstąpienia od umowy i odpowiedzialności za zgodność z umową, art. 6 ust. 1 lit. b RODO
Handling newsletter subscription.	When subscribing to the newsletter, you are required to provide the necessary data to receive it as specified in the subscription form. Providing data is a condition for receiving the newsletter. In addition, the mailing system logs your IP address when you sign up for the newsletter, determines your approximate location, the email client you use to manage your email, and tracks your actions related to the messages sent to you. Therefore, we also have information on which messages you opened, which links you clicked on, and so on. In the mailing system, we can also define, based on various criteria related to your activity, interests, or other preferences, specific groups or segments of newsletter recipients that influence the type of messages you receive as part of the newsletter. The data you provide in connection with the newsletter subscription is used to send you the newsletter, and the legal basis for their processing is the performance of an electronic service contract, as well as our legitimate interest, which in this case is to achieve marketing goals.	art. 6 ust. 1 lit. b RODO, art. 6 ust. 1 lit. f RODO

	Regarding the processing of information that does not come from you but was collected automatically by the mailing system, we rely in this area on our legitimate interest in analyzing the behavior of newsletter subscribers to optimize mailing activities. You can unsubscribe from the newsletter at any time by clicking on the dedicated link in each message sent as part of the newsletter, or simply by contacting us. Unsubscribing from the newsletter does not lead to the deletion of your data from the mailing system. The data is archived for the purpose of potential identification, investigation, or defense of claims related to the newsletter, as well as to ensure the possibility of demonstrating that the newsletter activities were carried out in accordance with the law.	
Comment / Opinion Handling.	When adding a comment / review, you must provide the necessary data for its publication in the form designated for adding comments / reviews. Providing data is a condition for the publication of comments / reviews. In addition, the comment / review system saves your IP number from which you submitted the comment / review. The comment / review system may be operated by an external provider. In such a situation, using the system is subject to the regulations and privacy policy of the external provider. Detailed information about external providers' tools can be found in the section dedicated to the tools we use. The data is processed for the purpose of publishing the comment / review, which is our legitimate interest. The comment or review you added, along with your published data, will be visible on the page according to the settings. You can modify or delete the comment / review at any time. The deleted comment / review along with your data goes to the archive for the purpose of establishing, investigating or defending claims related to the comment / review.	art. 6 ust. 1 lit. f RODO
Contact and correspondence handling.	When contacting us through available means of communication, such as email, social media messengers, chats, etc., you naturally provide your personal data contained in the correspondence. Providing data is a condition for establishing contact. In addition, the communication system records your IP address used to send the message. The communication system (e.g. chat, messenger) may be provided by an external provider. In such a situation, the use of the system is subject to the terms and privacy policy of the external provider. Detailed information on external provider tools can be found in the section dedicated to the tools we use. The data is processed for the purpose of conducting communication, which is our legitimate interest. After the communication is completed, the data is archived for the purpose of potential determination, investigation, or defense of claims related to the communication conducted.	art. 6 ust. 1 lit. f RODO

Fulfillment of tax and accounting obligations.	In connection with the execution of the agreement, we also fulfill various tax and accounting obligations, in particular by issuing an invoice, including the invoice in our accounting documentation, and storing documentation, etc. To issue an invoice, we process data such as name, company, business address, and tax identification number. Providing data required by tax law is necessary to fulfill the specified obligations.	art. 6 ust. 1 lit. c RODO w związku z właściwymi przepisami prawa podatkowego
Creating an archive.	For the purposes of our business, we may create archives, both in traditional and digital form. Personal data that we processed in connection with you may be included in the archives, and their scope may vary depending on what data we received and what scope of data is justified for archival purposes. In this case, we rely on our legitimate interest in organizing and managing personal data storage.	art. 6 ust. 1 lit. f RODO
Defense, determination, or pursuit of claims.	Using our website, as well as entering into a contract with us, may result in certain claims by either party in the future. Therefore, we are entitled to process personal data for the purpose of defending, establishing or pursuing claims. For this purpose, we may process any personal data that relates to a given claim, so the scope of the data may vary depending on the nature of the claim. In this case, we rely on our legitimate interest in protecting our interests.	art. 6 ust. 1 lit. f RODO
Creating target groups for advertising.	Your email address stored in our database may be transmitted to a specific advertising system (such as Facebook Ads, LinkedIn Ads) for the purpose of creating an advertising audience group using that email address. During the use of this function, the email address is hashed before being sent to the advertising system in order to create the advertising audience group. The email address will be used in a matching process conducted by the advertising system. The advertising system does not disclose the email address to third parties or other advertisers, and removes the email address immediately after the matching process is completed. The advertising system implements processes and procedures to ensure the confidentiality and security of the transmitted email address and the set of user identifiers creating the advertising audience group, among other things by applying technical and physical safeguards. Creating an advertising audience group using your email address is our legitimate interest, which in this case is the realization of our marketing objectives.	art. 6 ust. 1 lit. f RODO
Social media management	If you follow our profiles on social media or interact with content published by us on social media, we naturally see your data that is publicly available in your social media profile. We process this data only within the given social media platform and solely for the purpose of managing the given social media platform, which is our legitimate interest. If you contact us through private messages, you naturally provide us with your personal data contained in the content of the correspondence, in	art. 6 ust. 1 lit. f RODO

	particular your image and name and surname. Your data in this case is processed for the purpose of contacting you and the legal basis for processing is our legitimate interest. It may happen that we will be the party initiating contact with you through social media in order to offer cooperation, in which case your data will be processed for the purpose of searching for potential contractors, offering and establishing cooperation, which is our legitimate interest. Messages sent to us through social media are automatically archived through tools available within individual social media platforms and are available to us until you delete them. You have access to all messages exchanged with us in the private messages section. Your use of social media is subject to the terms and privacy policies of the administrators of these services, and these administrators provide you with electronic services independently and independently of us.	
Analysis and statistics using only Anonymous Information	We conduct analytical and statistical activities using tools provided by external suppliers. Within the analytical tools, we have access only to Anonymous Information. Processing Anonymous Information is based on our legitimate interest, which involves creating, reviewing, and analyzing statistics related to user activity on the site to draw conclusions that allow us to optimize our actions later on. From the tools, we have access only to a set of statistics and information not attributed to specific individuals. Detailed information on external supplier tools can be found in the section devoted to the tools we use	art. 6 ust. 1 lit. f RODO
Personal marketing using exclusively Anonymous Information	We conduct marketing activities using tools provided by external vendors. Within marketing tools, we only have access to Anonymous Information. Processing of Anonymous Information is based on our legitimate interest, which is to conduct marketing activities based on Anonymous Information and to target advertisements within external systems based on Anonymous Information for the purpose of marketing our own products and services. From the tools, we only have access to a set of statistics and information that are not attributed to specific individuals. Detailed information about external vendor tools can be found in the section dedicated to the tools we use.	art. 6 ust. 1 lit. f RODO
Organizing promotional campaigns	To increase sales of our products/services, we may conduct various promotional campaigns, including in cooperation with external partners. The rules related to the organization of promotional campaigns are specified in separate regulations. The scope of personal data that we will process in connection with the organization of the promotional campaign may vary depending on the type of promotional campaign. The legal basis for processing your personal data is our legitimate interest, which in this case is marketing and increasing sales of our own products.	art. 6 ust. 1 lit. b RODO, art. 6 ust. 1 lit. f RODO
Providing additional features using only Anonymous Information	On our websites, we can embed video or audio players, social media widgets, comment modules, chat, newsletter forms, or other tools provided by third parties. All of these tools process Anonymous Information. Processing Anonymous Information is based on our	art. 6 ust. 1 lit. f RODO

	legitimate interest, which in this case is to provide the possibility of using additional features on the site. From the tools, we do not have access to any other information, and moreover, this information is not needed for anything - Anonymous Information is processed only to enable additional features to work. Detailed information about third-party tools we use can be found in the section dedicated to the tools we use.	
Fulfillment of obligations related to personal data protection	As a personal data controller, we are obliged to fulfill the obligations related to the protection of personal data. Therefore, we may process your personal data if it is necessary to fulfill these obligations (e.g. in the case of considering your request regarding your personal data). The scope of data depends on what data we need to fulfill the obligation and demonstrate compliance with GDPR. In addition, in this case, we also rely on our legitimate interest, which is to secure data necessary to demonstrate accountability.	art. 6 ust. 1 lit. c RODO, art. 6 ust. 1 lit. f RODO

 # 4: What information do we have about you?

We have described the scope of processed data in relation to each processing purpose. Information in this regard can be found above, in point 3 of the Privacy Policy. The data includes information such as:

- first and last name,
- email address,
- phone number,
- IP address,
- delivery address,
- invoice data,
- data collected in the mailing system,
- data related to added comments/opinions,
- information visible in social media profiles,
- information contained in correspondence,
- Anonymous Information.

 # 5: What are "Anonymous Information"?

We use tools that collect various information about you related to the use of our website. These include:

- information about the operating system and internet browser,
- viewed subpages,
- time spent on the website,
- transitions between individual subpages,
- clicks on specific links,
- mouse movements,
- scrolling of the page,
- the source from which you access the website,
- age range in which you fall,
- your gender,
- your approximate location limited to the city,

- your interests or other preferences determined based on online activity,
- video recordings of your sessions on our websites,
- heat maps illustrating your behavior on our websites.

This information is referred to as "Anonymous Information" in this Privacy Policy.

This information is referred to as "Anonymous Information" in this Privacy Policy. Anonymous Information in itself does not, in our opinion, have the character of personal data because it does not allow us to identify you, and we do not combine it with typical personal data that we collect about you. Nevertheless, considering the rigorous case law of the Court of Justice of the European Union and divided opinions among lawyers, as a precaution, in case Anonymous Information is attributed the character of personal data, we have also included detailed explanations on the processing of this information in the Privacy Policy.

We are unable to provide you with access to Anonymous Information about you, as we are unable to assign any of this information to a specific user. From the tools that collect Anonymous Information, we only have access to a set of statistics and information that is not assigned to specific individuals.

The processing of Anonymous Information enables us to provide you with the ability to use the functionality available on the website. In addition, Anonymous Information is used for analytical and statistical purposes, as well as marketing purposes such as setting and targeting advertisements.

Anonymous Information is also processed by tool providers in accordance with their terms of use and privacy policies. They may use this information to provide and improve services, manage them, develop new services, measure the effectiveness of advertising, protect against fraud and abuse, and personalize content and ads displayed on specific services, websites, and applications. Detailed information related to this can be found in the section dedicated to the tools we use.

 # 6: Where did we get your personal data?

In most cases, you provide them to us yourself. For example, this happens when you register a user account, place an order, submit a complaint or withdraw from a contract, contact us via email or chat, or use the functionality available on our website or in external services (e.g. social media).

In addition, some information about you may be automatically collected by the tools we use. Detailed information about external tool providers can be found in the section dedicated to the tools we use.

In exceptional cases, we may also obtain your personal data from other sources, e.g. when the entity that employs you designates your data as a contact person in matters related to the concluded agreement, or when you represent an entity that concludes an agreement with us.

 # 7: Are the data safe?

We take care of the security of your personal data. We have analyzed the risks associated with the individual processes of processing your data, and then implemented appropriate security and personal data protection measures. We constantly monitor the state of the technical infrastructure, train our staff, review the procedures in use, and implement necessary improvements.

 # 8: How long will we keep personal data?

Your personal data is processed for as long as it is justified for a given purpose of data processing, and therefore processing periods may vary depending on the purpose. Please note that the termination of processing of your data for one purpose does not necessarily lead to the complete

deletion or destruction of your personal data, as the same set of data may be processed for another purpose, for the period specified for it. Complete deletion or destruction of data occurs when we have completed the implementation of all purposes and in other cases indicated in the GDPR.

Below you will find a description of the processing periods:

- **Order fulfillment and contract execution** - data related to the contract will be processed for the time necessary to conclude and execute the contract;
- **Actions taken to complete orders by customers** - data related to incomplete orders will be processed for a maximum period of 6 months from the day you placed the order;
- **Complaints and withdrawal from the contract** - data related to complaints and withdrawal from the contract will be processed for the time necessary to handle the complaint or withdrawal;
- **Newsletter** - data related to the newsletter will be processed for the period of your use of the newsletter;
- **Comments / opinions** - data related to posting a comment / opinion will be processed until you delete the comment or opinion;
- **Contact and correspondence handling** - data related to correspondence handling will be processed for the duration of our contact;
- **Tax and accounting obligations** - data related to the performance of tax and accounting obligations will be processed for the period provided for in tax law regulations, usually 5 years from the end of the tax year;
- **Archive** - data related to the archive will be processed until the information in the archive becomes obsolete;
- **Establishment, investigation, and defense of claims** - data related to claims will be processed until the claims are time-barred, with the limitation period for claims varying under applicable law (e.g. for entrepreneurs it may be 3 years, and for consumers 6 years);
- **Recipient groups** - data related to recipient groups will be processed until the information becomes obsolete or you effectively object;
- **Social media** - in principle, I have no influence on the storage period of your personal data on social media. They are available on LinkedIn under the terms and conditions and privacy policy of those services. We are not able to delete your data from LinkedIn - only you can do that;
- **Analysis and statistics** - data related to analytics and statistics will be processed until the information becomes obsolete or you effectively object;
- **Own marketing** - data related to own marketing will be processed until the information becomes obsolete or you effectively object;
- **Organization of promotional campaigns** - data related to the organization of promotional campaigns will be processed for the time necessary to conduct the promotional campaign;
- **Additional tools** - data related to additional tools will be processed until the information becomes obsolete or you effectively object;

- **Data protection obligations** - data related to data protection will be processed until the information becomes obsolete, you effectively object, or the limitation period for our liability as a data controller expires.

If we process your personal data based on your consent, you can withdraw such consent at any time, either by your action or by contacting us using the contact details provided. Please note that withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

 # 9: What are the recipients of personal data?

We can venture to say that modern business cannot do without services provided by third-party entities. We also use such services. Some of these services involve the processing of your personal data. External service providers who are involved in the processing of your personal data are:

- **hosting provider** – for the purpose of storing data on a server;
- **email system provider** – for the purpose of using an email system;
- **invoicing system provider** – for the purpose of issuing invoices;
- **CRM system provider** – for the purpose of streamlining work;
- **customer service system provider** – for the purpose of streamlining the customer service process;
- **landing page management tool provider** – for the purpose of collecting data through landing pages;
- **cloud computing provider** – for the purpose of using cloud solutions;
- **accounting office** – for the purpose of using accounting services;
- **law firm** – for the purpose of providing legal services to us;
- **technical support** – for the purpose of conducting technical work related to the areas in which data is processed;
- **order fulfillment entity, courier company, Polish Post** – for the purpose of handling the logistics of orders for physical products;
- **other subcontractors, in particular IT solution providers** – for the purpose of cooperating with various subcontractors who may have access to your personal data if they provide services related to such access.

If necessary, your personal data may be made available to a legal advisor or attorney bound by professional secrecy. The need may arise from the necessity of seeking legal assistance that requires access to your personal data.

Your personal data may also be transferred to tax offices to the extent necessary to fulfill tax, settlement, and accounting obligations. This particularly concerns all declarations, reports, financial statements, and other accounting documents containing your personal data.

Moreover, if necessary, your personal data may be made available to entities, authorities, or institutions authorized to access data under applicable law, such as police, security, courts, and public prosecutors.

Your data is provided to courier companies to the extent necessary to deliver the ordered goods. These companies become independent data controllers of your personal data.

Regarding Anonymous Information, providers of tools or plugins that collect Anonymous Information have access to them. These tool providers are independent data controllers of the data they collect and may share it on terms determined by themselves in their own regulations and privacy policies, which we have no control over.

 # 10: Do we transfer data to third countries or international organizations?

Yes, some of the processing operations of your personal data may involve their transfer to third countries.
We transfer your personal data to third countries in connection with the use of tools that utilize resources located in third countries, particularly in the USA. Providers of these tools guarantee an adequate level of personal data protection through appropriate compliance mechanisms provided by the GDPR, in particular by using standard contractual clauses.
Currently, your personal data is being transferred to third countries in connection with our use of the following solutions:

Type of solution	Provider of the solution	Third country
Email	Microsoft	USA
Customer Relationship Management system	HubSpot	USA

Additionally, Anonymous Information collected in connection with the use of tools listed in the annex to this privacy policy may be transferred to third countries, particularly the USA.

 # 11: Do we use profiling?

We do not make decisions based solely on automated processing, including profiling, which would have legal or similarly significant effects on you. However, we do use tools that may take certain actions based on information collected through tracking mechanisms, but we believe that these actions do not have a significant impact on you, as they do not differentiate your situation as a customer, affect the terms of the contract you may enter into with us, etc.

By using certain tools, we may, for example, direct personalized ads to you based on your previous actions taken on a given website, or suggest products that may interest you. This is what is known as behavioral advertising. We encourage you to deepen your knowledge of behavioral advertising, particularly with regard to privacy issues. Detailed information, along with the ability to manage your behavioral advertising settings, can be found here.

 # 12: What are your rights?

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

- the right to access your data and receive a copy of it;
- the right to rectify (correct) your data;
- the right to erasure (if you believe we have no grounds to process your data, you can request that we delete it);
- the right to restrict processing of data (you can request that we restrict the processing of your data to storage or agreed-upon actions if you believe we have incorrect data or are processing it unlawfully);
- the right to object to the processing of data (you have the right to object to the processing of your data based on a legitimate interest; you should specify a particular situation that justifies us stopping the processing subject to objection; we will stop processing your data for these purposes unless we demonstrate that our grounds for processing the data override your rights or that we need your data to establish, exercise, or defend legal claims);
- the right to data portability (you have the right to receive your personal data that you have provided to us based on a contract or your consent in a structured, commonly used, and machine-readable format, and you can instruct us to transmit that data directly to another controller);
- the right to withdraw your consent for processing personal data, if you have previously given it;
- the right to lodge a complaint with a supervisory authority (if you believe that we are processing your data unlawfully, you can file a complaint with the President of the Personal Data Protection Office or another relevant supervisory authority).

The principles related to the implementation of the above-mentioned rights are described in detail in Articles 16-21 of the GDPR. We encourage you to familiarize yourself with these regulations. Please note that the rights mentioned above are not absolute and will not apply to all processing of your personal data.

We emphasize that one of the rights mentioned above always applies to you: if you believe that we have violated the regulations on the protection of personal data when processing your personal data, you have the possibility to lodge a complaint with the supervisory authority (the President of the Personal Data Protection Office).

 # 13: Do we use cookies and what are they exactly?

Our website, like almost all other websites, uses cookies.

Cookies are small text information stored on your end device (e.g. computer, tablet, smartphone) that can be read by our teleinformatics system (own cookies) or third-party teleinformatics systems (third-party cookies). Certain information can be saved and stored in cookie files, which teleinformatics systems can then access for specific purposes.

Some of the cookies we use are deleted after the end of the internet browser session, i.e. after it is closed (session cookies). Other cookies are stored on your end device and allow for recognition of your browser during subsequent visits to the website (persistent cookies).

If you want to learn more about cookies as such, you can read, for example, this material.

 # 14: How do we justify the use of cookies?

We use cookies based on your consent, except in situations where cookies are necessary for the proper provision of electronic services to you.

Cookies that are not necessary for the proper provision of electronic services remain blocked until you give your consent to use cookies. During your first visit to a given website, we display a message asking for your consent along with the option to manage cookies, meaning you can decide which cookies you agree to and which ones you want to block.

 # 15: Can you disable cookies?

Yes, you can manage cookie settings within your web browser. You can block all or selected cookies, as well as block cookies from specific websites. You can also delete previously stored cookies and other website data and plugins at any time.

Web browsers also offer the option of using an incognito mode. You can use this mode if you don't want information about visited pages and downloaded files to be saved in your browsing and download history. Cookies created in incognito mode are deleted when all windows of this mode are closed.

Browser plugins are also available that allow you to control cookies, such as Ghostery , and additional software, particularly antivirus packages, can also provide cookie control options.

Moreover, there are tools available on the Internet that allow you to control some types of cookies, particularly for bulk management of behavioral advertising settings.

We also give you the ability to control cookies directly from our website. We have implemented a special mechanism for managing cookies that allows you to block those cookies that you don't want. Remember that disabling or limiting cookie support may prevent you from using some of the features available on our website and cause difficulties in using the website, as well as many other websites that use cookies. For example, if you block cookies from social media plugins, buttons, widgets, and social functions implemented on our website may be unavailable to you.

 # 16: What are the purposes of using our own cookies?

Own cookies are used to ensure the proper functioning of individual mechanisms on our pages, such as remembering the contents of the basket for a certain period of time after adding selected products to it, properly sending forms visible on the pages, handling newsletter forms, etc. Own cookies also store information about the cookie settings defined by you through the cookie management mechanism.

 # 17: What third-party cookies are used?

You can find a list of tools that require the use of cookies, as well as a description of the cookies used, in the attachment to this Privacy Policy.

 # 18: Do we track your behavior on the website?

Yes, we use external provider tools that involve collecting information about your activities on our websites. These tools are described in detail in the attachment to this Privacy Policy.

 # 19: Are we targeting you with personalized ads?

Yes, we use external tools that allow us to target ads to specific audience groups based on various criteria such as age, gender, interests, profession, job, and actions taken on our site. These tools are described in detail in the attachment to this Privacy Policy.

 # 20: How can you manage your privacy?

The answer to this question can be found in many places in this Privacy Policy when describing various tools, behavioral advertising, consent to cookies, etc. However, for your convenience, we have gathered this information again in one place. Below you will find a list of options for managing your privacy.

- cookie settings within your web browser;
- browser plugins that support cookie management, such as Ghostery;
- additional software for managing cookies;
- incognito mode in your web browser;
- behavioral advertising settings, such as youronlinechoices.com;
- cookie management mechanism available on our website;
- Google Analytics Opt-out;
- Google Ads Settings;
- LinkedIN Privacy Settings;

 # 21: Is there anything else you should know?

As you can see, the issue of personal data processing, the use of cookies and privacy management in general is quite complicated. We have made every effort to provide you with the most comprehensive knowledge on the important matters. If anything is unclear to you, you want to learn more, or simply talk about your privacy, please contact us at the following address: contact@silfra-consulting.com.

 # 22: Can this Privacy Policy be subject to changes?

Yes, we can modify this Privacy Policy, especially due to technological changes and changes in the law. If you are a registered user, you will receive a message about any changes to the Privacy Policy. The changes to the Privacy Policy take effect no earlier than 7 days. All archived versions of the Privacy Policy are linked below.

Attachment to Privacy Policy

LIST OF TOOLS USING COOKIES

Tool name	Description of operation and cookies
Google Tag Manager	We use Google Tag Manager, provided by the American company Google LLC, which is a tool for managing tags and loading scripts on the website. Google Tag Manager as a tool itself does not collect any information other than what is necessary for its proper functioning, but it is responsible for loading other scripts described below.
Google Analytics	We use the Google Analytics tool provided by the US company Google LLC. To use Google Analytics, a special tracking code for Google Analytics has been implemented in the website's code. The tracking code uses cookies related to the Google Analytics service. At any time, you can block the Google Analytics tracking code by installing a browser add-on provided by Google. Google Analytics automatically collects information about your activity on our website. Within Google Analytics, we only have access to Anonymous Information. Thanks to the information collected in this way, we can analyze user behavior on our website, conduct related statistics, and then draw conclusions from these statistics in order to design solutions that improve the efficiency of the site. If you are interested in the details of how Google uses data from websites and applications that use Google services, we encourage you to review that information.
Google Ads	We use remarketing features available in the Google advertising system provided by the American company Google LLC. During your visit to our website, a Google remarketing cookie is automatically left on your device, which collects information about your activity on our site. Thanks to this information, we are able to display ads to you within the Google network based on your behavior on our site. For example, if you view a particular product, information about it will be recorded by the remarketing cookie, which will allow us to show you an ad related to that product or any other we deem appropriate. This ad will be displayed to you within the Google network while you are browsing the Internet, visiting other websites, and so on. We emphasize that when using Google Ads, we use only Anonymous Information. Using Google Ads, we are only able to define the audience groups we want our ads to reach. Based on this, Google decides when and how to show our ad to you. If you do not want to receive personalized ads, you can manage your ad settings directly on the Google website: https://adssettings.google.com/. If you are interested in details related to the use of data from websites and applications that use Google services, we encourage you to read this information.
LinkedIN Insight Tag	We use advertising features available within the LinkedIn service provided by LinkedIn Ireland Unlimited Company. In order to direct personalized ads to you based on your behavior on our website, we have implemented the LinkedIn Insight Tag within the LinkedIn website, which automatically sends information about your activity on our website to the LinkedIn advertising system. Within the LinkedIn advertising system, we only have access to Anonymous Information. Thanks to the information collected in this way, we are able to display ads to you within the LinkedIn advertising

	system depending on your behavior on our website and to measure the effectiveness of the advertising campaigns carried out in order to draw conclusions allowing for the optimization of these campaigns in terms of effectiveness. The information collected by LinkedIn is also used by LinkedIn to deliver ads and reporting, improve security on the LinkedIn website, research, and develop products. This information is also used to generate aggregate and anonymous measurements of the use of the LinkedIn advertising service, for example, to calculate the total number of conversions made through the LinkedIn service. Details in this regard are described in LinkedIn's privacy policy. You can manage your privacy settings on LinkedIn here.