# International Public Affairs Academy Privacy Policy

# **Identification of the Controller**

The Controller of your personal data is Central European Consulting Sp. z o.o. with its registered office at ul. Wiejska 12, 00-490 Warszawa, KRS [National Court Register] No. 0000187342, NIP [Tax identification Number] 5261018705.

## **Controller contact information**

You can contact the Controller:

- in the written form at the correspondence address: ul. Wiejska 12, 00-490 Warszawa
- by email, at the email address: poland@cecgr.com

# Objectives and legal basis for data processing

Objectives of data processing are connected with:

- Communication with you in connection with your message sent to Controller by email, on the basis of legitimate interest fulfilled by the Controller, i.e. Article 6 Section 1 letter f GDPR. Such legitimate interest shall be contact with you;
- Archiving documents, statistics and potential seeking claims or defence against claims; the
  basis for such processing shall be necessity of data processing for fulfilment of A legitimate
  interest of the Controller, i.e. Article 6 Section 1 letter f GDPR. A legitimate interest shall
  include document archiving, keeping statistics, seeking claims as well as defence against
  claims;
- Sending marketing content (newsletter) activities via email are carried out on the basis of a separate consent to use the appropriate communication channel (Article 6 Section 1 letter a GDPR).

# Term of data storing

Your personal data shall be processed throughout the term necessary to fulfil objectives in which data are processed or until an objection is made, if the basis for processing is a legitimate interest of the Controller or withdrawal of consent, if the basis for processing is an express consent. Subsequently, the Controller shall store them until potential claims are barred by time limits or by the expiry of the obligation to store data arising from law provisions.

# **Recipient categories**

Your data can be processed by the Controller's subcontractors; these are entities the services of which the Controller uses when fulfilling its obligations.

Your personal data shall be always processed with the use of appropriate protection measures and safety of personal data.

As the Controller uses services of suppliers which registered office is in the United States, it can transfer your personal data to countries outside the European Economic Area. This transfer is based on standard contractual clauses. The transfer takes place only with appropriate safeguards. More information in this regard can be obtained via email at poland@cecgr.com.

The Controller shall not undertake towards you any decisions by automated means, including in the form of profiling.

# Your rights

You have the right to:

- Access your personal data as well as the right to request rectification, erasure or restrict processing thereof;
- Data portability;
- Withdraw consent for personal data processing to an extent in which the basis for processing
  your personal data is consent (withdrawing consent shall not affect compliance with the right
  process which was applied based on consent prior to its withdrawal);
- Raise an objection against processing your personal data to an extent in which the basis for processing of your personal data is a premise of a Controller's legitimate interest;
- File a complaint with the supervising authority in charge of protection of personal data, if you think that data processing infringes GDPR.

To exercise your rights, please contact the Controller.

# **Cookies**

#### What are cookies?

Cookies files are small text and numeric files which are saved by the IT system on your telecommunications system (on the computer, telephone or any other device by way of which the Webpage was accessed) during browsing the Webpage and enable identification if the Webpage is accessed again from such device (e.g. a computer, a telephone) on which they have been stored.

## Basis for cookies use

Cookies files are used upon your consent. Your consent is expressed by appropriate software setting, in particular an internet browser, installed in the telecommunications device used by you to browse Webpage contents.

## Why does the Controller use cookies files?

The main purpose of use cookies files by the Controller is to manage the Webpage and improve the quality of contents transferred by the Controller. Cookies files are necessary for the Webpage to display and operate in an appropriate manner. The Controller can also process data contained in cookies files for keeping anonymous statistics and analyses presenting the manner of Webpage use, an average time spent on the Webpage. Cookies files shall not be used to designate identification of Webpage users.

## What type of cookies files are used on the Webpage?

The Webpage uses the following cookies types:

- Persistent cookies which are stored on the device for a limited term; storage of such files does not depend on closing the browser;
- Third party cookies set by other server-sides, e.g. Google Analytics.

The Webpage uses both own cookies as well as third party files.

### What tools does the Controller use?

The Controller uses Google Analytics tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to create statistics, analyse the Webpage operations, improving the quality of using it (on the basis of a legitimate interest).

## How to change cookies settings?

A majority of browsers accepts cookies storage implicitly. You can withdraw or change the scope of prior given consent to use cookies on the Webpage as well as erase them from its browser at any time. You can restrict or disable cookies in your browser by use of such settings at any time so that its blocks cookies or warns you against saving cookies on the device used by you. In such case it can happen that you will not have access to certain contents on the Webpage and, in extreme cases the Webpage cannot display properly as access is blocked.

## **Server logs**

Use of Webpage results in sending requests to the server on which the Webpage is stored. Each request sent to the server is stored the server logs. Logs include, *inter alia*, your IP address, server date and time, information related to internet browser and operation system you use. Logs are saved and stored on the server. Data saved in server logs are not associated with specified persons using the Webpage and are not used by me for your identification. Server logs constitute solely an auxiliary material to administer the Webpage and contents thereof shall not be disclosed to anyone except for persons authorised to administer the server.