

# Joint controllers Gazeta.pl and Wyborcza – privacy notices carried out on the basis of Articles 13 and 14 of the GDPR

## I. Joint controllers, contact details, data protection officer and point of contact

The joint controllers ("**Joint Controllers**") of personal data are:

- a) Gazeta.pl sp. z o. o., with its registered office in Warsaw, 8/10 Czerska Street, 00-732 Warsaw ("**Gazeta.pl**"), which can be contacted at: [biuroreklamy@grupagazeta.pl](mailto:biuroreklamy@grupagazeta.pl) or in writing, at the above address. Gazeta.pl has appointed Data Protection Officer, who can be contacted at: [iod@grupagazeta.pl](mailto:iod@grupagazeta.pl) or in writing, at the address as above;
- b) Wyborcza sp. z o. o., with its registered office in Warsaw, 8/10 Czerska Street, 00-732 Warsaw, which can be contacted at the following address: [reklama@wyborcza.pl](mailto:reklama@wyborcza.pl) or in writing, at the above address. Wyborcza has appointed Data Protection Officer who can be contacted at: [iod@wyborcza.pl](mailto:iod@wyborcza.pl), or in writing, at the address as above.

The joint controllers have designated a contact point for data subjects, which is Wyborcza. Contact with Joint Controllers is possible through this contact point, at the address: [reklama@wyborcza.pl](mailto:reklama@wyborcza.pl) and DPO: [iod@wyborcza.pl](mailto:iod@wyborcza.pl) as well as in writing, at the address as above.

## II. Purposes and bases of processing

1. The personal data **of a party** to a contract operating a sole proprietorship or operating in the form of a civil partnership will be processed for the following purposes:

- a) preparing and presenting offers to you, including documenting necessary activities and maintaining shared database of customers and contact persons – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR) consisting in enabling the establishment or maintenance of further business relationship;
- b) possible establishment, pursuit of claims or defence against claims – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); the legitimate interest consists in the enforcement and protection of their rights by the Joint Controllers;
- c) conducting analytical and statistical activities in order to prepare offers tailored to your needs, in order to respond to the changing market environment and customer expectations, in order to improve the effectiveness of the activities carried out by the Joint Controllers, including improvement of the products or services offered - the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); legitimate interest consists in improving targeted offers as well as improving the products or services offered;
- d) direct marketing of products or services (if possible in the light of applicable law) – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); the legitimate interest lies in enabling the Joint Controllers to conduct direct marketing of products or services;
- e) to conduct communication for the purposes specified in this document, as well as for other purposes resulting from the subject of the communication – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); legitimate interest consists in ensuring the continuity of communication, enabling contact with the Joint Controllers.

Personal data **of contact persons acting on behalf of or for the benefit of a party to the contract (including employees, co-workers, representatives, contact persons)** will be processed for the purpose of:

- a) preparing and presenting offers, including documenting necessary activities and maintaining a shared database of customers and contact persons – the legal basis for processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); legitimate interest is to enable the establishment or maintenance of a further business relationship;
- b) possible establishment, pursuit of claims or defence against claims – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); legitimate interest is to enable the Joint Controllers to pursue or defend themselves against claims;
- c) direct marketing of products or services (if possible in the light of applicable law) – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); the legitimate interest is to enable the Joint Controllers to conduct direct marketing of products or services;
- d) conducting analytical and statistical activities of offers for the entity on behalf of or for which you act, responding to the changing market environment and customer expectations, in order to improve the effectiveness of the activities carried out by the Joint Controllers, including improving the products or services offered - the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); legitimate interest is to improve targeted offers as well as to improve the products or services offered;
- e) to conduct communication for the purposes specified in this document, as well as for other purposes resulting from the subject of the communication – the legal basis for the processing is the legitimate interest of the Joint Controllers (Article 6(1)(f) of the GDPR); legitimate interest is to ensure the continuity of communication, to enable contact with the Joint Controllers.

## III. Source and scope of data

1. Personal data were obtained:

- a) directly from you, as a party to the contract or as a contact person or

- b) from another person who contacts the Joint Controllers directly on your behalf (e.g. from the entity in which you are employed or a person who is responsible for concluding and performing contracts in the entity operated by you) or
  - c) in the case of previous cooperation with Gazeta.pl – from Gazeta.pl, and in the case of previous cooperation with Wyborcza – from Wyborcza, or
  - d) from publicly available sources, i.e. in particular from the website or advertisement of the entity you keep or represent, public registers such as Central Registration and Information on Business, National Court Register.
2. The Joint Controllers process only your personal data that are necessary to achieve the above purposes. The scope of the processed data includes, in particular, the following categories:
- a) identification data (including name, surname, position);
  - b) contact data (including phone number, email address, company, Tax Identification Number (NIP), National Business Registry Number (REGON), address);
  - c) data on the scope of cooperation, including business conditions and results of cooperation, billing or payment data, activity history, satisfaction survey results, account manager;
  - d) communication data (including date, time, IP);
  - e) other data concerning the party to the contract or the contact person obtained in connection with the establishment of business implementation, conclusion or performance of the contract.

#### **IV. Data recipients**

Personal data may be provided to entities providing services to the Joint Controllers, such as sales, IT, archiving or document destruction, accounting, tax, debt collection, legal, consulting, auditing, postal and courier services, as well as correspondence handling, statutory auditors, banks and insurers, as well as entities authorised under the law.

#### **V. Retention period**

Personal data will be processed for the duration of the business relationship. The retention period may be extended each time by the limitation period for claims, if the processing of personal data is necessary for the possible pursuit of claims or defence against such claims by Joint Controllers. Data processed on the basis of the legitimate interest of the Joint Controllers will be processed until the Joint Controllers achieve individual purposes, unless you have previously objected to the processing. If a business relationship is not established, your personal data will be deleted within 18 months of the attempt to establish a business relationship.

#### **VI. Rights**

1. You have the right to access the content of the data, including their copies, to request their rectification, deletion, restriction of processing and the right to data portability.
2. You have the right to object to the processing of your personal data based on the legitimate interest:
  - a) for direct marketing purposes;
  - b) for purposes other than direct marketing, for reasons related to your particular situation.
3. You have the right to request access to the essence of the arrangement of the Joint Controllers.
4. You also have the right to lodge a complaint with a supervisory authority dealing with personal data protection if you believe that the processing of your personal data violates the provisions of the GDPR. In Poland, it is the President of Personal Data Protection Office (PUODO).
5. In order to exercise the rights, please contact the contact point designated by the Joint Controllers via the contact details indicated in point I. above.

#### **VII. Data requirement**

In the case of data provided directly by you, providing the data is voluntary, but failure to provide them may make it difficult or impossible to pursue the legitimate interests of the Joint Controllers.

#### **VIII. Transfer of data to third countries**

Joint Controllers may transfer your data outside the European Economic Area (EEA) - data may be transferred to India, in relation to IT support provided by a supplier from India. The security measure used in this case are standard contractual clauses concluded with the supplier (processor). At your request, the Joint Controllers will provide you with a copy of these safeguards at the headquarters of the Contact Point referred to in point I. In other cases, personal data will not be transferred. Such a transfer will only take place if an adequate level of data protection is ensured, which is established in particular by: cooperation with data processors in countries for which a relevant decision of the European Commission has been issued, the use of standard contractual clauses issued by the European Commission, the application of binding corporate rules approved by the competent supervisory authority and, where necessary, ensuring other safeguards necessary to ensure an adequate level of data protection.

#### **IX. Profiling and automated decisions**

Your data will not be used for automated decision-making, including profiling, within the meaning of Article 22 of the GDPR, i.e. to make a decision that produces legal effects or similarly significantly affects you.