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I. Introduction

The following document describes the privacy policy of Polonia Warszawa sp. z o.o. seated in Warsaw (00-206) at 6 Konwiktorska Street, premises 102, NIP 5252596006, REGON 147440802, registered in the National Court Register of District Court in Warsaw, 12th Economic Department of the National Court Register under KRS number: 0000943946 (hereinafter: **PW Sp. z o.o.**). The privacy policy of PW Sp. z o.o. (hereinafter: **the Policy**) defines the principles of collecting, processing, using and protecting the data and information coming from the users using all the websites belonging to PW Sp. z o.o., among others:

- www.kspolonia.pl,
- www.bilety.kspolonia.pl,
- www.sklep.kspolonia.pl,

and services provided by PW Sp. z o.o.

Please read the Policy carefully. By accessing or using a website belonging to PW Sp. z o.o. and submitting any Personal Data, the User accepts the terms of this Policy and acknowledges that they have read the contents of this Policy.

II. Terms used in the Policy

Personal Data – defined as Personal Data within the meaning of the GDPR, i.e., all information relating to an identified or identifiable natural person. This data directly or indirectly identifies a natural person with regards to the name, email address or telephone number of the natural person and other data that, in connection with the abovementioned, may identify the User.

GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and the free movement of such

data, and repealing Directive 95/46 / EC (general Data Protection Regulation), pursuant to which Sii and its Subsidiaries process Users' Personal Data.

Online Store – an online store run by PW Sp. z o.o, operating at the following address: sklep.kspolonia.pl/.

User – means a user using all websites belonging to PW Sp. z o.o., in particular a customer of PW Sp. z o.o. online store, a visitor to the websites belonging to PW Sp. z o.o., a newsletter subscriber, a participant of a contest or other event organized by PW Sp. z o.o., a person asking a question.

Services – Services electronically provided by PW Sp. z o.o., by means of the Internet service, in particular: ticket or season ticket purchase, fan card registration and maintenance, account creation in the online store and order processing, marketing and promotional activities, in particular newsletter subscription, sending inquiries via the contact form, application for participation in competitions and other events organized by PW Sp. z o.o., application for participation in the Academy, training activities.

III. Providing Personal data

By providing Personal Data on www.kspolonia.pl or any other website that belongs to PW Sp. z o.o., the User confirms that they have all the necessary permissions to disclose Personal Data that will be later used by PW Sp. z o.o. in a manner described in this Policy.

In case the User provides any Personal data of other persons (in particular, Personal data of a child enrolled in the Academy), the User may do so only under the condition it does not violate the provisions of the applicable law and personal rights of such persons.

IV. Personal Data Controller

PW Sp. z o.o. 6 Konwiktorska Street, premises 102, 00-206 Warsaw, phone number: +48 22 746 92 62 is the Personal Data Controller of the data provided through the use of PW Sp. z o.o. websites, in particular in connection with online purchase of tickets or season tickets, sending marketing information, including newsletters, accepting registrations for conferences, contests and events, and using other services included in the websites.

In all matters related to the principles of processing of Personal Data set forth in this Policy, the User may make contact by sending a message to rodo@kspolonia.pl or to the following address: Polonia Warszawa Sport Club, 6 Konwiktorska Street, premises 102, 00-206 Warsaw.

V. Processing of Personal Data – purposes, legal basis, scope

The Personal Data Controller processes data for the following purposes:

Purpose of processing Personal Data	Legal basis for processing Personal Data	Scope of processing Personal Data
Provision of service by electronic means – account maintenance (purchase and sale of tickets for matches)	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract	<ul style="list-style-type: none"> • Full name • PESEL number • Email address • Login and password to an account
Provision of service by electronic means – account maintenance (online store)	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract	<ul style="list-style-type: none"> • Full name • Email address • Phone number • Residence address • Billing address • Login and password to an account • Bank account number
Sale of tickets for matches	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract	<ul style="list-style-type: none"> • Full name • PESEL number • Email address
Sale of products – online store maintenance (order processing)	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract	<ul style="list-style-type: none"> • Full name • Delivery address • Email address • Phone number • Bank account number
Conducting analyses, surveys and statistical measurements and marketing (including data analysis and profiling for marketing purposes) of the Controller’s products and services and assessing satisfaction with PW Sp. z o.o.’s products and services, including tailoring services and products to the User’s needs, analyzing and improving services and products, and providing security of the services	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller	<ul style="list-style-type: none"> • IP address • Information on preferences of Users who use products and services of the Personal Data Controller
Complaint processing (purchase and sale of tickets for matches)	<p>Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller</p> <p>Art. 6 para. 1 point b GDPR – conclusion and execution of the contract</p>	<ul style="list-style-type: none"> • Full name • Email address • PESEL number • Data contained in the complaint’s description • Data contained in the transactions
Complaint processing (online store)	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller	<ul style="list-style-type: none"> • Full name • Delivery address • Billing address

	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract	<ul style="list-style-type: none"> • Email address • Phone number • Bank account number • Data contained in the complaint’s description • Data contained in the transactions
Investigation and defense of rights in the event of mutual claims	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller	<ul style="list-style-type: none"> • Full name • Delivery address • Billing address • Email address • Phone number • Bank account number • Data contained in the transactions
Sending marketing and promotional information about products and services, events and news, including newsletter subscription	Art. 6 para. 1 point a GDPR – consent to processing of Personal Data	<ul style="list-style-type: none"> • Full name • Email address
Sending to Users, at the email addresses or telephone numbers provided by them, responses to inquiries sent via the contact form, as well as for the purpose of contacting Users and responding to messages and questions previously sent by them	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller	<ul style="list-style-type: none"> • Full name • Email address • Phone number • Content of the inquiry
Organization and conduct of contests and other events by PW Sp. z o.o.	Art. 6 para. 1 point a GDPR – consent to processing of Personal Data	<ul style="list-style-type: none"> • Full name • Email address • Residence address
Ensuring security of organizing matches and efficient organization and conduct of mass events, including identification of fans	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller	<ul style="list-style-type: none"> • Full name • PESEL number • Image
Training activities of the Controller and the entities cooperating in the field of systems supporting training activities	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract	<ul style="list-style-type: none"> • Full name of the child • Full name of the guardian • Age of the child • Email address • Phone number
Maintaining a profile, especially to inform Users about the Controller’s activities, promoting the Controller’s services, various types of events, services and products, as well as to communicate with Users through the functionalities available in social media and respond to short questions directed through the	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller	<ul style="list-style-type: none"> • Full name • Email address • Content of the inquiry

communicators available on the said portals		
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Regarding the processing of Personal Data for the sale of products available in the PW Sp. z o.o. online store, more detailed information on the processing of Personal Data of Users using the online store is provided in Chapter 11 of the Policy.

In the context of the processing of Personal Data for the handling of an inquiry, the legitimate interest is reflected in the ability to address the inquiry sent and provide the User with a comprehensive response. Without the processing of Personal Data, in particular contact data, PW Sp. z o.o. will not be able to provide an answer and, thus, help resolve the issue indicated in the inquiry. The Controller shall provide the possibility to contact them by sending a question in the form of a traditional letter or by e-mail or electronic contact forms.

In the context of consent to send commercial information to the User, when the User asks a question about a specific commercial offer via the contact form, sending the form means consent to receive this commercial offer referred to in the inquiry, through the so-called "clear affirmative action". For a detailed explanation, please refer to the section of this Policy.

To the extent that the processing of Personal Data occurs for the purpose of concluding an agreement with PW Sp. z o.o., such as purchase of a ticket, season ticket or fan card, the User's provision of data is a condition for the conclusion of that agreement. Provision of the data is voluntary but necessary to conclude and execute the contract. If Personal Data is not provided, the contract will not be concluded.

For the rest, i.e., if providing Personal Data is not a legal or contractual requirement and is not a condition for concluding a contract, providing Personal Data is voluntary and takes place on the basis of the given consent, e.g., consent to join the Academy, consent to receive the newsletter.

VI. Transfer of Personal Data

Personal data may be transferred to third parties cooperating with PW Sp. z o.o., i.e., providers of services provided to PW Sp. z o.o., in particular, IT services, including services for the maintenance and operation of websites, providers of IT systems, providers of services for the maintenance and operation of systems used for the distribution of match tickets and for online purchases, for the purpose of processing online payments, providers of video surveillance services, ticket distribution services, services in the field of marketing activities (advertising agencies, mass-mailing companies, etc.), including taking photographs, video recordings, providers of accounting, legal, auditing, consulting, advisory, insurance, security, destruction or archiving of documents services, banks, companies affiliated with PW Sp. z o.o.

All entities to which PW Sp. z o.o. transfers Personal Data are verified by the Controller in terms of data protection security, and are obliged, on the basis of a relevant agreement concluded with the Controller, to use Personal Data only for the purposes designated by the Controller. Transferring Personal Data is carried out in the form of entrusting it for processing. For this purpose, PW Sp. z o.o. enters an appropriate entrustment agreement for the processing of Personal Data with the above-mentioned entities, meeting the requirements of Art. 28 para. 3 of the GDPR.

Every User has the right to obtain information to which entity the Personal Data has been made available on the principles set forth in Chapter VII of this Policy. The exercise of the User's rights is identical to the rules concerning the processing of Personal Data by PW Sp. z o.o., as set forth in Chapter VII of this Policy.

PW Sp. z o.o. is also authorized to share the Personal Data of a User with entities authorized under applicable law, i.e., public authorities, including courts and law enforcement agencies, upon their legitimate request or for the purpose of defense or assertion of claims, or if such obligation is explicitly imposed by law. Recipients of data of persons participating in matches organized by PW Sp. z o.o. are also entities authorized to receive such data on the basis of legal regulations, in particular the Act on the organization of mass events, e.g., the Polish Football Association, the entity managing the games in which PW Sp. z o.o. participates, or the Police. Data of the Academy participants' is also additionally received by such entities as the Polish Football Association, and the data is transferred based on the concluded contracts for membership in the Academy.

As a general rule, Personal Data will not be transferred outside the European Economic Area (EEA) or to international organizations. If such necessity occurs, Personal Data will be transferred outside the EEA or to international organizations with adequate protection. The Controller will inform the User about the intent of such transfer of Personal Data.

VII. User's Rights

In accordance with Chapter III, Art. 15-22 GDPR, a User has the following rights in connection with the processing of their Personal Data by PW Sp. z o.o.:

- 1) the right to access their Personal Data,
- 2) the right to rectify the processed data,
- 3) the right to erase data ("right to be forgotten"),
- 4) the right to restrict data processing,
- 5) the right to transfer data,
- 6) the right to object to further data processing,
- 7) the right not to be subject to decisions based solely on automated processing, including profiling,
- 8) the right to withdraw consent to the processing of Personal Data,
the right to file a complaint about improper processing of Personal Data to the Personal Data Protection Office.

The execution of each of the rights described above is carried out at the request sent to rodo@kspolonia.pl by the User. PW Sp. z o.o. considers the submitted request and sends a response within 1 month from the date of receipt of the request. The response contains the result of the consideration of the request, i.e., what specific actions have been taken along with the estimated time for the fulfillment of the entire request, if specific actions require a longer implementation time.

As part of the right indicated in point 8 above, you may at any time withdraw your consent to further processing of Personal Data for purposes that require consent, with the provision that withdrawal of consent shall not affect the legal use of Personal Data in activities performed on the basis of consent prior to its withdrawal. To withdraw your consent, send a message via email or send a message by traditional mail to the contact information indicated in this Policy.

As part of the right to access Personal Data, the User is entitled to obtain the following information, in the form of copies:

- 1) purposes of processing Personal Data,
- 2) categories of Personal Data, i.e., what data we process, e.g., name, surname, telephone number,
- 3) information about the recipients or categories of recipients of the data, i.e., to whom (person, company, institution) the Personal Data may be transferred,
- 4) information on the right to request correction of the data, deletion or restriction of data processing from PW Sp. z o.o. and to object to specific data processing,
- 5) information about the possibility of submitting a complaint to the President of the Personal Data Protection Office,
- 6) information on the source of the data, if the data was not obtained directly from the User, i.e., indication of the person, company or institution that provided the Personal Data,
- 7) information on the use of profiling, i.e., on what basis it is carried out, what the consequences of profiling may be for the User.

At the same time, PW Sp. z o.o. informs that each subsequent copy of the Personal Data involves a fee resulting from the costs incurred in connection with the creation of another copy of the Personal Data. PW Sp. z o.o. will notify the User of the costs after assessing the scope of the information indicated in the request.

PW Sp. z o.o. reserves the right to respond to a request to execute any of the User's rights later than stated above (up to two months) due to the number of inquiries or the complicated nature of the sent inquiry. By the complicated nature of the submitted inquiry we mean the need to compile data from multiple information systems or the need for consultation with more than one person from the department or departments in order to obtain the information that is the subject of the request. In both of the above situations PW Sp. z o.o. is obliged to inform the User of this fact, giving reasons each time.

PW Sp. z o.o. informs that PW Sp. z o.o. may refuse to execute any of the User's rights specified in Articles 15-22 of the GDPR in the situation when the User makes requests in a continuous and excessive manner, without any justification. Each time PW Sp. z o.o. will justify its refusal to exercise the right indicated in the request. By continuous and excessive we mean sending subsequent requests with a similar request to the first one, in spite of processing and informing about its execution, e.g., the User sends a request for access to information, PW Sp. z o.o. executes the request, i.e., sends a summary of the information in its possession, and the User sends the same request again, without explaining the reason for sending a new request for information.

VIII. Processing of Personal Data for marketing purposes

By creating an account, submitting an inquiry, entering a contest or other event organized by PW Sp. z o.o., the User may consent to the processing of Personal Data for the purpose of sending marketing information about the products and services offered by PW Sp. z o.o., by deliberately marking the checkbox. Consent may be withdrawn at any time, subject to the provisions of Section VII, paragraph 3 of this Policy.

The User gives their consent also to receiving the newsletter by entering their email address on the newsletter sign-up form, or by marking the "I consent" checkbox when filling out the contact form. The inclusion of an email address in the newsletter sign-up form is a so-called express affirmative consent to the processing of Personal Data within the meaning of Art. 4(11) of the GDPR on the definition of consent and the related recital 32 of the GDPR explaining what an express affirmative action is. According to the aforementioned recital, an explicit affirmative action is a communication by the User to PW Sp. z o.o. that they consent to the use of the email address provided in the form for PW Sp. z o.o. to send newsletters with information promoting PW Sp. z o.o. This is one of the acceptable – besides marking the checkbox – forms of expressing the User's consent to use the provided email address for the above-mentioned purpose.

Consent to send unsolicited commercial information to Users in accordance with Art. 10 of the Act on Providing Services by Electronic Means and Art. 172(1) of the Telecommunications Act is given by Users independently and separately, by marking a dedicated checkbox next to the content of the consent.

In order to download certain documents available on the websites belonging to PW Sp. z o.o., it may be necessary to fill out a form and enclose Personal Data in it. The processing of the data will be based on consent (Art. 6 para. 1 point a of the GDPR) expressed through explicit affirmative action. However, if the User wishes to receive other marketing information, they can choose whether or not they want to mark a dedicated checkbox. If the checkbox is not marked, it is an indication to PW Sp. z o.o. that the User is not interested in receiving information, and therefore will not be included in mailing lists.

IX. Processing of Personal Data and profiling

As PW Sp. z o.o., we would like to inform you that in the course of shopping and online ordering, as well as in the creation and sending of marketing information, we may compile Users' Personal Data in order to tailor offers, marketing materials, newsletters to specific Users. Therefore, in PW Sp. z o.o., profiling is carried out as a form of automated processing of Personal Data involving the use of certain data about the User.

Acquired data includes: information from social media profiles, location, and data provided by Users using forms on the PW Sp. z o.o. website. This allows us to:

- 1) be more informed and better tailor the selection of PW Sp. z o.o.'s offers to meet demands of Users who are customers of PW Sp. z o.o.;
- 2) tailor the marketing and advertising materials to the interests and needs of Users.

One of the tools used to conduct profiling is Google Analytics. Its aim is to analyze traffic on the website. This tool can associate the data provided to PW Sp. z o.o. by the User in the course of processing an order or in connection with receiving a newsletter with data available on the Internet, provided by the User themselves. Data binding allows PW Sp. z o.o. to create a User profile for:

- 1) precisely tailoring offers corresponding to the requirements and demands of Users who are customers of PW Sp. z o.o.,
- 2) targeting marketing content in accordance with the User's preferences and interests,
- 3) sending information about planned contests or other events organized by PW Sp. z o.o. touching upon topics related to the User's competences or interests.

The purposes of using the tool indicated above and as well as their result are the legitimate interests of PW Sp. z o.o. as a controller of Personal Data (Art. 6 para. 1 point f of the GDPR). The interests are understood in such a way that the Personal Data obtained with the use of the tool enables making decisions that reduce the operating costs incurred by PW Sp. z o.o. for sales, promotional activities, increasing the attractiveness of PW Sp. z o.o. as an entity that is reliable and focuses on the quality of services provided and the satisfaction of Users, while respecting Users by sending anticipated information in accordance with their preferences and interests.

PW Sp. z o.o. assures that the information and data obtained using the tool are used exclusively for the purposes mentioned above, and are not shared with other entities specializing in profiling. The User may object to profiling at any time, in accordance with Chapter VII, points 6-7 of this Policy, with the provision that this involves the inability to send marketing and commercial information or receive new commercial offers tailored to the User's profile. Such objection means stopping further profiling using the indicated tool. However, it does not stop the processing of Personal Data in case of having another legal basis, e.g., consent.

X. Organization and running contests and other events

PW Sp. z o.o. processes Users' Personal Data in connection with the organization and running contests or other events organized by PW Sp. z o.o. By signing up for a contest or an event (either through a dedicated form or through an application sent to a dedicated email address), the User gives their consent to the processing of their Personal Data for the execution of all operations related to the contest or event. The legal basis for data processing is consent (Art. 6 para. 1 point a of the GDPR) expressed in the form of a *clear affirmative action*. The User may withdraw their consent at any time within their rights, in accordance with Section VII, point 8 of the Policy, which involves the inability to further participate in the contest or event. Detailed rules for the organization of a contest or event are described in the regulations of the given contest or event.

XI. Processing of Personal Data when running the online store

1. All terms and expressions used in this chapter (Seller, Sales Agreement, Order Form, etc.) refer to the rules of the online store ([link](#)).
2. Submission of Personal Data in the mandatory fields of the Registration Form, Order Form, Review Form, Subscription Form and Contact Form is voluntary but necessary, respectively, to set up and maintain an Account, place and process an Order, comment on and rate the Goods, subscribe to the Newsletter and send a message to the Seller via the Contact Form.
3. The Controller processes Personal Data if it is necessary for using the website of the Store and its functionalities, which is also the primary purpose of processing Personal Data.
4. The specific purpose, scope and categories of recipients of Personal Data processed by the Seller will be determined in each case by the Data Subjects' activities when using the Store and its functionalities and other activities directly related to the maintenance of the Store.
5. The specific purposes of processing the Personal Data indicated in the Registration Form are as follows:
 - a. execution of the Electronic Service Agreement consisting in the establishment and maintenance of an Account through the Registration Form on the terms and conditions specified in the Rules – then the basis for the processing of personal data is the necessity of personal data processing for the conclusion and execution of the agreement (Art. 6 para. 1 point b GDPR), and in the scope of personal data provided optionally expressed consent (Art. 6 para. 1 point a GDPR);
 - b. archiving documents, keeping statistics and analyses, and establishing and asserting potential claims or defending against claims related to the conclusion and execution of the Electronic Service Agreement involving the establishment and maintenance of an Account through the Registration Form on the principles set forth in the Rules and Regulations – then the basis for the processing of Personal Data is the necessity of data processing for the realization of the legitimate interests of the Seller in the form of archiving documents, keeping statistics and analyses, and establishing and asserting potential claims or defending against them (Art. 6 para. 1 point f GDPR).
6. The specific purposes of processing the Personal Data indicated in the Order Form are as follows:
 - a. placement and execution of the Order and execution of the Sales Agreement – then the basis for the processing of Personal Data is the necessity of Personal Data processing to conclude and execute the Electronic Service Agreement consisting of enabling Customers to place Orders through the Order Form and to conclude and execute the Sales Agreement on the principles set forth in the Rules and regulations (Art. 6 para. 1 point b GDPR), and in the scope of Personal Data provided optionally expressed consent (Art. 6 para. 1 point a GDPR);
 - b. making settlements, including tax settlements, and keeping accounting records – then the basis for the processing of Personal Data is the necessity of fulfilling legal obligations imposed on the Seller under the law (Art. 6 para. 1 point c GDPR);

- c. return of the Goods and settlement of the Order in case of withdrawal from the Sales Agreement by the Consumer – then the basis for the processing of Personal Data is the necessity to fulfill the legal obligations of the Seller under the law (Art. 6 para. 1 point c GDPR);
 - d. archiving documents, conducting statistics and analysis, and establishing and asserting potential claims or defending against claims related to the conclusion and execution of the Electronic Service Agreement consisting of allowing Customers to place Orders via the Order Form and with the conclusion and execution of the Sales Agreement on the principles set out in the Rules and Regulations – then the basis for the processing of Personal Data is the necessity of data processing to realize the legitimate interests of the Seller in the form of archiving documents, conducting statistics and analysis, and establishing and asserting potential claims or defending against them (Art. 6 para. 1 point f GDPR).
7. The specific purposes of processing the Personal Data indicated in the Review Form are as follows:
- a. execution of the Electronic Service Agreement consisting of enabling Customers to comment on and rate Goods through the Review Form on the terms and conditions specified in the Rules and Regulations – then the basis for the processing of Personal Data is the necessity of Personal Data processing for the conclusion and execution of the agreement (Art. 6 para. 1 point b GDPR), and in the scope of Personal Data provided optionally – expressed consent (Art. 6 para. 1 point a GDPR);
 - b. archiving documents, conducting statistics and analyses, and establishing and asserting potential claims or defending against claims related to the conclusion and execution of the Electronic Service Agreement consisting in enabling Customers to comment on and rate Goods through the Review Form – then the basis for processing Personal Data is the necessity of data processing to realize the legitimate interests of the Seller in the form of archiving documents, conducting statistics and analyses, and establishing and asserting potential claims or defending against them (Art. 6 para. 1 point f GDPR).
8. The specific purposes of processing the Personal Data indicated in the Subscription Form are as follows:
- a. execution of the Electronic Service Agreement consisting in enabling Customers to subscribe to the Newsletter via the Subscription Form on the terms and conditions specified in the Rules and Regulations – then the basis for the processing of Personal Data is the necessity of Personal Data processing for the conclusion and execution of the agreement (Art. 6 para. 1 point b GDPR), and in the scope of Personal Data provided optionally expressed consent (Art. 6 para. 1 point a GDPR);
 - b. marketing of the Seller's goods and services and the transfer of other commercial information, as well as the dissemination of information about special offers, events and news related to the activities of the Seller – then the basis for the processing of Personal Data is the necessity of data processing for the realization of the legitimate interests of the Seller in the form of marketing of its goods and services, the transfer of other commercial information and the dissemination of information about the activities of the Seller (Art. 6 para. 1 point f GDPR);
 - c. archiving documents, conducting statistics and analyses, and establishing and asserting potential claims or defending against claims related to the conclusion and execution of the Electronic Service Agreement consisting of subscribing to the Newsletter through the Subscription Form – then the basis for the processing of personal data is the necessity of data processing to realize the legitimate interests of the Seller in the form of archiving documents, conducting statistics and analyses, and establishing and asserting potential claims or defending against them (Art. 6 para. 1 point f GDPR).

9. The specific purposes of processing the Personal Data indicated in the Contact Form are as follows:
 - a. execution of the Electronic Service Agreement consisting of enabling Customers to send messages to the Seller through the Contact Form on the terms and conditions specified in the Rules and Regulations – then the basis for the processing of Personal Data is the necessity of Personal Data processing for the conclusion and execution of the agreement (Art. 6 para. 1 point b GDPR), and in the scope of Personal Data provided optionally – expressed consent (Art. 6 para. 1 point a GDPR);
archiving documents, keeping statistics and analyses, and establishing and asserting potential claims or defending against claims related to the conclusion and execution of the Agreement for Electronic Services consisting of enabling Customers to send messages to the Seller through the Contact Form – then the basis for the processing of Personal Data is the necessity of data processing to realize the legitimate interests of the Seller in the form of archiving documents, keeping statistics and analyses, and establishing and asserting potential claims or defending against them (Art. 6 para. 1 point f GDPR).
10. Other specific purposes for processing Personal Data are as follows:
 - implementation of legal obligations imposed on the Seller related to the affairs of Data Subjects, such as reporting malfunctions of the Store or filing a complaint – then the basis for the processing of Personal Data is the necessity to fulfill legal obligations imposed on the Seller under the law (Art. 6 para. 1 point c GDPR);
 - b. Contact with Data Subjects in connection with messages and inquiries sent to the Seller – then the basis for processing Personal Data is the necessity of processing the data to realize the legitimate interests of the Seller in the form of handling messages and inquiries sent by Data Subjects (Art. 6 para. 1 point f GDPR).
11. Personal Data will be processed for the period necessary for the purposes for which they are processed, in particular:
 - a. for the period during which the relation justifying such processing exists, in particular for as long as the Account is maintained or for the period necessary for the processing of the Order, as well as for the handling of complaints or other types of reported complaints and requests;
 - b. for the limitation period of claims against the Seller or claims of the Seller against the Data Subject arising from the law or the limitation period of tax obligations related to business events to which the Data Subject was a party, as well as for the duration of mediation, court, arbitration and similar proceedings related to such claims;
 - c. for the period necessary to respond to a complaint or other type of claims and requests, generally for a period that does not exceed 30 days; this period may be extended by the limitation period of claims of the Data Subject or claims of the Seller resulting from the law if the processing of such data will be necessary for settling or asserting claims, as well as for the purpose of defense against such claims, and by the periods of related mediation, court, arbitration, and similar proceedings;
 - d. for the period resulting from regulations imposing certain legal obligations on the Seller;
 - e. until the Data Subject raises an objection at any time on grounds relating to their particular situation in the case of processing (relating to their Personal Data) based on the legitimate interests of the Seller, unless the Seller demonstrates the existence of legitimate grounds for the processing of Personal Data overriding the interests, rights and freedom of the Data Subject or grounds for settling, asserting or defending claims;

f. until the withdrawal of consent in the case of processing of Personal Data on the basis of consent expressed by the Data Subject.

12. Data shared by the Seller with the following entities:

- a. providers of services provided to the Seller in the field of maintenance and operation of the Store's website;
- b. providers of information processing systems used in the creation and maintenance of an Account or the placement of Orders;
- c. entities that process online payments, in particular entities that maintain the PayU Service;
- d. entities that provide transportation, postal, forwarding and logistics services, in particular entities that operate the website of the Apaczka logistics service;
- e. entities providing accounting, legal, advisory, auditing, and consulting services;
- f. public authorities, including courts, at their justified request or if such obligation is imposed by law, or for the purpose of defending or asserting claims.

XII. Period of processing of Personal Data

Personal Data is processed and stored by the Controller for the period necessary to achieve the purposes for which the Personal Data is processed. For details, please refer to the table below.

Purpose of processing	Storage period	Legal basis
Provision of service by electronic means – account maintenance (purchase and sale of tickets for matches)	Until the account is cancelled – sending a request for deletion	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract
Provision of service by electronic means – account maintenance (online store)	Until the account is cancelled – sending a request for deletion	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract
Sale of tickets for matches	The period of sale of tickets for the match and the time of the match In the case of passes – the duration of the football season	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract
Sale of products – online store maintenance (order processing)	Period of obligatory storage of transactional documentation (bills, receipts, invoices) – 5 years	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract
Conducting analyses, surveys and statistical measurements and marketing (including data analysis and profiling for marketing purposes) of the Controller's products and services and assessing satisfaction with PW Sp. z o.o.'s products and services, including tailoring services and products to the User's needs, analyzing and improving services and products, and providing security of the services	Until the objection to further processing of Personal Data in order to achieve the goal is raised	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller

Complaint processing (purchase and sale of tickets for matches)	Time for processing and consideration of complaints – up to 30 days	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller Art. 6 para. 1 point b GDPR – conclusion and execution of the contract
Complaint processing (online store)	Details in Chapter XI of the Policy	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller Art. 6 para. 1 point b GDPR – conclusion and execution of the contract
Investigation and defense of rights in the event of mutual claims	Limitation period of claims – 3 – 6 years	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller
Sending marketing and promotional information about products and services, events and news, including newsletter subscription	Until the consent is withdrawn	Art. 6 para. 1 point a GDPR – consent to processing of Personal Data
Sending to Users, at the email addresses or telephone numbers provided by them, responses to inquiries sent via the contact form, as well as for the purpose of contacting Users and responding to messages and questions previously sent by them	Time for processing and answering the submitted question – up to 30 days	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller
Organization and conduct of contests and other events by PW Sp. z o.o.	Duration of the competition, event	Art. 6 para. 1 point a GDPR – consent to processing of Personal Data
Ensuring security of organizing matches and efficient organization and conduct of mass events, including identification of fans	Duration of the football match, mass event	Art. 6 para. 1 point f GDPR – legitimate interest of the Personal Data Controller
Training activities of the Controller and the entities cooperating in the field of systems supporting training activities	Duration of the contract for conducting training activities	Art. 6 para. 1 point b GDPR – conclusion and execution of the contract

Not every case allows establishing a specific storage period for Personal Data. Therefore, the Controller, in accordance with the provisions of the GDPR, has indicated the criteria for storing data.

If the Personal Data will be processed in order for the Controller to fulfill their obligations imposed by applicable laws, the Personal Data shall be stored and processed for the time prescribed by applicable laws. The period of data processing may be extended if the processing is necessary for the establishment, assertion or defense against potential claims, as well as at the request of competent public authorities, and after that period - only in the case and to the extent required by law.

After the expiration of the processing period, Personal Data is irreversibly deleted or irreversibly anonymized.

XIII. Security rules

PW Sp. z o.o. has implemented appropriate security measures (organizational and technical) to protect Personal Data from loss, misuse, unlawful processing or modification. The Controller undertakes to protect all information disclosed by Users in accordance with standards of security protection and maintaining confidentiality. Access to Users' Personal Data has been restrictively limited so that the information cannot be accessed by unauthorized persons. The Controller conducts a risk analysis on an ongoing basis to ensure that the Personal Data is processed by the Controller lawfully and securely, ensuring, above all, limited access to the data only to authorized persons and only to the extent that it is necessary due to the tasks they perform. The Controller shall ensure that all operations on Personal Data are recorded and performed only by authorized employees and associates of the Controller.

PW Sp. z o.o. is authorized to share data with entities entitled under applicable laws. The Controller shall take all necessary measures to ensure that also their subcontractors and other cooperating entities guarantee the application of appropriate security measures whenever they process Personal Data on behalf of the Controller.

XIV. Cookies

PW Sp. z o.o. declares that www.kspolonia.pl as well as other websites owned by PW Sp. z o.o. use cookies. i innych należących do PW Sp. z o.o. używamy cookies. By using this website, you consent to the storing of cookies on your device, as explained below. Cookies used on www.kspolonia.pl and other websites owned by PW Sp. z o.o. may be set by our website or by the website of a third party cooperating with PW Sp. z o.o. Cookies are used for, among others:

- 1) adapting the content of websites to the User's preferences and optimizing the use of websites; in particular, these files allow you to recognize the device of the website user and appropriately display the website tailored to their individual needs, as well as remember the
- 2) creation of statistics and analyses that help to understand how website Users use the websites, which allows improving their structure and content,
- 3) providing Users with advertising content more tailored to their interests.

Types of cookies used by PW Sp. z o.o.:

- 1) "essential" cookies, enabling the use of services provided by the site, e.g., enabling the use of sessions;
- 2) "functionality" cookies, allowing "remembering" the User's selected settings and personalizing the User's interface, e.g., with regard to the selected mobile/desktop version, the last phrases typed by the User, the appearance of the website, etc.;
- 3) "analytics" cookies, allowing the Users' activity on the website.

By using the PW Sp. z o.o. website, a User agrees to the installation of cookies. The User can block the storage of cookies by appropriately changing the settings of the web browser. Disabling cookies

may affect the functioning of the site, in particular, cause limitations in the functionality of the services provided. Lack of change of browser settings means acceptance of the set cookies.

XIV. Change in Policy

Due to the development and progress of technology and changes to the legal regulations, the rules set forth in this Policy may change. The User will be informed about changes in these rules by posting the new content of this document on www.kspolonia.pl, preceded by the sending out of an appropriate message to the Users informing them about the changes and when the changes will take effect.

In matters not covered by this Policy, the rules and regulations available at www.kspolonia.pl and applicable laws shall apply.

The nullity of any of the provisions of this Policy shall not affect the validity of its remaining provisions and this document as a whole. The Controller shall then be obliged to replace such null provision to the extent of the purpose of this document.