

# Information clause for the users of the "Bdigital" Site

## Who is the personal data controller?

The controller, or the entity deciding on how your personal data will be processed is BURDA MEDIA POLSKA Sp. z o. o. with its registered office in Warsaw 02-674, Marynarska 15, Tel. +48 22 3603 900, e-mail: [recepca@burdamedia.pl](mailto:recepca@burdamedia.pl),

## To obtain more information on the processing of your personal data:

Write to the personal data protection officer appointed by us:  
e-mail: [iod@burdamedia.pl](mailto:iod@burdamedia.pl)

## What is the purpose and legal basis of the processing of your personal data by Burda?

We process your personal data because this is necessary for the purposes of:

- Providing services via the site including contacting you to present campaigns and offer special discounts and rebates;
- Conclusion and performance of contracts;
- Fulfilment of public and legal obligations including tax issues;
- Defending or pursuing potential claims;
- Conducting research and statistical analysis – analytics;
- Responding to your requests;
- Conducting marketing activities including direct marketing of Burda's own services and products and services or products of Trusted Partners
- Contacting you for advertising purposes and marketing-related purposes.

## How long will your personal data be stored for?

Regarding the provision of services via the site and for purposes related to the conclusion and performance of contracts, your personal data will be processed for as long as you continue to use the site.

After you stop using the site, your personal data may still be used, however, only if this is permitted or required by the law e.g. processing for statistical purposes, settlement of liabilities or taxes related to the contracts made or for the purpose of defending or pursuing claims. In such case, the personal data will be processed only for a term necessary to fulfil such purposes, no longer than 6 years after you stop using the site (statute of limitation for claims).

As regards statistical measurements, your personal data will be processed for this purpose until you object to such processing or until you stop using the services provided by the Controller.

In the event of processing personal data for the purposes of sending commercial messages via electronic means, the data will be processed until the time you withdraw your consent for such processing.

## Remember that you can withdraw your consent for the receipt of commercial messages at any time via one of the following options:

- Clicking on the link in the email message containing commercial messages or the newsletter (opting-out);
- On selected sites after logging in to your account by unchecking the consents granted;
- Sending a request to the email address: [bok@burdamedia.pl](mailto:bok@burdamedia.pl).

**The withdrawal of the consent does not affect the lawfulness of the processing of personal data based on the consent prior to its withdrawal.**

## **Do you have to share your personal data with us?**

- The provision of personal data is necessary for use of the site. In the event of failure to provide us with your personal data, you will not be able to use the site.
- The processing of personal data for other purposes i.e. statistical analytics is necessary in order to ensure high-quality of the Controller's services. Failure to collect your personal data for this purpose may make the proper provision of services impossible.

## **What is the legal basis for the processing of your personal data?**

- Regarding the use of the site, conclusion and performance of contracts and processing complaints by the Controller, your personal data will be processed pursuant to Article 6.1(b) of the Regulation of the European Parliament and of the Council (EU) 2016/679 dated 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR") (it is necessary to performance of a contract to which the data subject is party).
- Regarding the processing of your personal data for marketing purposes, and for the purpose of defending or pursuing claims and for purposes of statistical analytics, your personal data will be processed pursuant to Article 6.1(f) of the GDPR (legitimate interest of the controller).
- Personal data processed for the purpose of fulfilling public and legal obligations including tax issues is processed pursuant to Article 6.1(c) of the GDPR – processing is necessary to fulfil a legal obligation to which the controller is subject.
- The legal basis for sending commercial messages via electronic means is your voluntary consent.

## **What rights do you have?**

We warrant that all of the following rights stipulated in the GDPR will be respected by us:

The right to request from the controller access to personal data and rectification or erasure of personal data or restriction of processing; the right to object to processing and when the data is processed pursuant to your consent: the right to withdraw your consent at any time; the right to file a complaint to a supervisory body. In the event data processing is automated as a result of performance of a contract – the right to data portability.

### **You can exercise your rights as follows:**

To rectify your personal data when you realise that your personal data is incomplete or incorrect.

To request the erasure of personal data: if you object to the processing of your personal data, if it turns out that your personal data is not processed lawfully or when the data ought to be erased for the purpose of fulfilling a legal obligations, when your personal data is no longer necessary for the purposes for which it was collected by the controller.

Regarding the restriction of personal data processing: when you realise that your personal data is incorrect – you can request that the processing of your personal data is restricted until the time we verify the accuracy of the data, as well as when your personal data is processed unlawfully but you will not want to have it erased as you might need it for defending or pursuing claims, alternatively, if you object to the processing of personal data until the time when it is established whether the legitimate interest on our part prevails over the basis for objection.

Regarding requests for data portability: when the processing is performed in an automated way and when the processing of your personal data is performed pursuant of a contract.

If you would like to object to any aspect of the processing of your personal data, please contact us directly.

### **The right to object:**

You have the right to object if your personal data is processed on the basis of legitimate interest or for statistical purposes and it will be justified with your being in an exceptional situation.

## **Who do we transfer your personal data to?**

Your personal data may be transferred to entities processing personal data on instruction of the Controller, including but not limited to, IT service providers, marketing agencies and collaborating

Brands – where such entities shall process your personal data pursuant to an agreement made with the controller and exclusively in compliance with the Controller's instructions.

Pursuant to the applicable law, we can also disclose your personal data to law authorised bodies such as courts, and law enforcement bodies.

Your personal data may also be made available to advertisers.

### **Partners**

In the event you consent to the receipt of commercial messages, your personal data may be disclosed to our Trusted Partners. Our marketing partners are various entities with whom we collaborate directly or indirectly. Among others, Partners develop and adjust personalised advertising content displayed on our website or the content of marketing messages. These include:

- Direct advertisers
- Agents of our services
- Publishers
- Advertising networks
- Media houses
- Interactive agencies

### **Is your personal data processed automatically by us (including profiling)?**

Your personal data may be processed in an automated way but will not be profiled and this will not produce any legal consequences for you nor will it essentially affect your situation in this regard.

### **Transfer of data beyond the European Economic Area**

Your personal data may be transferred to countries which are not members of the European Economic Area. Personal data may be transferred, for instance, to Google pursuant to a representation regarding the Privacy Shield in which Google declares compliance with the rules established by the US Department of Commerce as part of the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework governing the collection, use and storage of personal data respectively from European Union member states and Switzerland. Transfer of personal data to other entities will only be done if such entities ensure adequate safeguards and on the condition that effective personal data protection measures are applied.