

Privacy Policy

This document describes the rules for our processing - as the operator of the website available at: esaforgdansk.pl (hereinafter: the "Website") - of information about you, including personal data and cookies.

Who is the controller of your personal data and how can you contact them?

The controller of your data is Gdańska Agencja Rozwoju Gospodarczego spółka z ograniczoną odpowiedzialnością with its registered office in Gdańsk (80-560) at 11 Żaglowa Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Gdańsk-Północ in Gdańsk, VII Commercial Division of the National Court Register under KRS number 000328827, holding NIP 5833054620, REGON 220714278 with a share capital of PLN 645,789,000.00 (hereinafter the "Controller", "we", "us").

- You can contact the personal data controller via e-mail at: office@investgda.pl, or by phone at: +48 58 722 03 00.
- You can contact us regarding all matters related to the processing of personal data and the exercise of rights related to data processing.

Who does the Privacy Policy apply to and what is its scope?

The Privacy Policy applies to you as a Website User. It covers the rules for our processing of data obtained by us automatically, i.e., cookies, as well as personal data processed with your consent for the purpose of monitoring and keeping viewership statistics.

The protection of private information concerning Website Users is a priority for us; therefore, we make every effort to ensure you feel comfortable and safe while using the Website. This Privacy Policy applies to all private information, including your personal data, which is collected and processed through the Website, and specifies how we care for your personal data and your rights. It describes the rules for our processing of information about you, including cookie data.

To what extent and for what purpose do we process your personal data?

In connection with your use of the Website, your personal data is collected automatically. This is data about your activity on the Website, i.e., computer IP address, device and browser data, number and source of visits to the website, time of visit, viewed content, number and type of opened subpages (cookies, traffic data).

The personal data indicated above is processed by the Controller for the following purposes:

- providing electronic services in the scope of making content gathered on the Website available to Users, ensuring the user can use the website's functions and contact the Controller – the legal basis for processing is its necessity for the performance of a contract (Art. 6(1)(b) GDPR);

- technical and administrative, to ensure the security of the IT system and manage this system - the legal basis for processing is the legitimate interest of the Controllers (Art. 6(1)(f) GDPR);
- handling complaints from website users, as well as defending against potential claims - the legal basis for processing is the legitimate interest of the Controllers (Art. 6(1)(f) GDPR);
- for the purpose of monitoring and keeping viewership statistics (regarding the Google Analytics service) - the legal basis for processing is the user's consent (Art. 6(1)(a) GDPR).

How long do we keep your personal data?

We keep personal data in a form that permits the identification of the data subject for as long as we need it for the purposes set out in this Privacy Policy. This period will vary depending on your contacts and cooperation with us. As a rule, data is processed for the duration of the service provision or until an effective objection to data processing is raised in cases where the legal basis for data processing is the legitimate interest of the Controller.

The data processing period may be extended if processing is necessary to establish and pursue possible claims or defend against them, and after this time only if and to the extent required by law. Data related to network traffic analysis collected via cookies and similar technologies may be stored until the cookie expires. Some cookies never expire, therefore the data retention time will be equivalent to the time necessary for the controller to fulfill the purposes related to data collection, such as ensuring security and analyzing historical data related to website traffic.

After the processing period, the data is irreversibly deleted or anonymized (deprived of features allowing for the identification of a given person). The deletion of personal data is complete and permanent. Personal data processed on the basis of your consent will be stored until it is withdrawn or the purpose of processing ceases. We would like to note that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

How do we protect your personal data?

All your personal data obtained through our Website is processed in a manner ensuring its security, in accordance with generally applicable law, in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of 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).

Who is the recipient of your data and on what terms do we transfer data to third countries?

Your personal data may be disclosed to persons authorized by the Controller, entities providing services to the Controller, including technical and organizational services, e-mail services, as well as other entities/persons/authorities within the scope and on the terms arising from generally applicable law. The recipient of your data may also be the provider of the Google Analytics tool - Google Ireland Ltd.

If it is necessary to share personal data with third parties, we require them to maintain the confidentiality and security of information and use it only to enable the provision of a given service to us. We have concluded appropriate data processing agreements with entities to which we entrust personal data.

Your data may be transferred outside the European Economic Area (EEA), in particular to Google LLC based in the USA. Google LLC participates in the EU-US Data Privacy Framework program, which has been recognized by the European Commission as ensuring an adequate level of personal data protection (EC decision of July 10, 2023). In situations where data would be transferred to third countries not covered by a European Commission adequacy decision, the Controller applies appropriate safeguards, such as standard contractual clauses (in accordance with Art. 46 GDPR). You can obtain a copy of the safeguards regarding the transfer of data outside the EEA by sending an inquiry to the Controller's e-mail address.

What are your rights in connection with data processing?

In connection with the processing of your personal data and under the rules set out in the General Data Protection Regulation (GDPR), you have the right at any time to:

- access your personal data;
- request rectification of your personal data;
- request restriction of the processing of your personal data;
- request the deletion of your personal data, if the Controller is not obliged by law to process it. Despite the request to delete personal data in connection with an objection or withdrawal of consent, we may retain certain personal data to the extent necessary to establish, pursue or defend claims. This applies in particular to personal data covering browsing history, which we retain for the purpose of handling complaints and claims related to the use of our services;
- obtain information about the purposes of processing, categories of personal data processed, recipients or categories of recipients of such data, the planned storage period of your data or the criteria for determining this period, your rights under the GDPR and the right to lodge a complaint with a supervisory authority, the source of this data, automated decision-making, including profiling, and the safeguards applied in connection with the transfer of such data outside the European Union;
- object to the processing of data;

- withdraw consent to data processing at any time.

In the event of a request, we will make every effort to process it as quickly as possible. However, it is not always possible to fulfill the request. For example, the right to erasure cannot be exercised if we are obliged to store the data under a legal provision. We will inform you about the handling of the request in writing or by e-mail.

You have the right to lodge a complaint with the President of the Personal Data Protection Office as the supervisory authority for personal data protection if you believe that your personal data is processed by the Controller in a manner inconsistent with personal data protection laws.

To obtain information regarding your personal data, you can contact us via e-mail by sending a message to: rodo@investgda.pl or in writing to: Gdańska Agencja Rozwoju Gospodarczego spółka z ograniczoną odpowiedzialnością with its registered office in Gdańsk (80-560) at 11 Żaglowa Street. If you wish to withdraw your consent to data processing, you should also inform us about it via e-mail or in writing to the address indicated in the previous sentence.

What are "cookies" and how do we use them?

The Controller uses cookies. Cookies are IT data, in particular text files, which are stored on your end device and are intended for using the Website. Cookies usually contain the name of the website they come from, their storage time on the end device, and a unique number. Cookies are used to create statistics that help understand how users use the websites. Thanks to the use of cookies, we will be able to constantly improve the Website.

Two basic types of cookies are used as part of the Website's operation: "session" cookies and "persistent" cookies. "Session" cookies are temporary files that are stored on the user's end device until leaving the website or turning off the software (web browser). "Persistent" cookies are stored on the user's end device for the time specified in the cookie parameters or until they are deleted by the user.

Cookies used as part of the Website's operation can be divided into the following categories: necessary, performance, and functional.

- **Necessary cookies:** are always active. Without these files, you cannot navigate the Website or use its functions. We process your data in this regard based on Art. 6(1)(f) GDPR. You can object to such processing of your personal data, but in practice, this will prevent or significantly impede the use of our website.
- **Performance cookies:** are files that collect information about how users use the website, e.g., data on the most frequently visited subpages. They are transmitted to Google LLC based in the United States (domains to which cookies are sent: [googletagmanager.com](https://www.google.com), [gstatic.com](https://www.google.com), [google.com](https://www.google.com)). These files can only be activated with your consent, expressed by clicking the appropriate checkbox that appears after opening the Website. You can withdraw your consent at any time.

- **Functional cookies:** are used to save information about your choices, thanks to which we can offer improved and personalized functions. For example, cookies of this type may store information about tracking numbers entered in applications. These files can only be activated with your consent, expressed by clicking the appropriate checkbox that appears after opening the Website. You can withdraw your consent at any time.

By accepting Cookies, you consent to the storage of Cookies on your computer for the purposes specified above. You can block the storage of cookies on your device at any time. To do this, you should properly configure the settings of the browser you are using. The function to disable the possibility of storing cookies on the device can generally be found in the "settings", "options", or "preferences" of the web browser being used. In case of doubt or to obtain detailed information, you can use the "help" option of the web browser you are using.

What tools do we use in connection with the Website's operation?

GOOGLE ANALYTICS For statistical and analytical purposes, the Controller uses Google Analytics, provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Thanks to this tool, the Controller has the ability to obtain information regarding viewership statistics, website traffic information, basic demographic data, etc., which constitutes the legitimate interest of the Controller (Art. 6(1)(f) GDPR).

Furthermore, Google Analytics also enables the creation of aggregate reports. These data are statistical in nature and cannot be linked to specific users or IP addresses in any way. This data is used by the Controller to analyze user behavior, which aims to optimize and improve the Website we run. Details regarding data processing as part of the Google Analytics service are available at: <https://support.google.com/analytics/answer/6004245>.

To ensure the protection of your privacy, we have enabled the IP anonymization function (anonymizeIp), which shortens the user's IP address before it is saved or further processed by Google. As a result, the IP address is not stored in its full form, and the user cannot be identified solely on the basis of this identifier. You can block the operation of Google Analytics by installing a plugin provided by Google: <https://tools.google.com/dlpage/gaoptout>.