

# Privacy Policy

1. The Data Controller of the website available at automationtrader.com, hereinafter the Website, is Maciej Szczotka conducting business under the name "Automation Trader spółka z ograniczoną odpowiedzialnością" (limited liability company), with its registered office at 960 Capability Green, Luton, Bedfordshire LU1 3PE, NIP: 6463009354, REGON: 527345886, registered on January 3, 2024 by the District Court Katowice-Wschód, 8th Commercial Division of the National Court Register (KRS). Share capital: 50,000 PLN.

2. All inquiries, requests, and complaints concerning the processing of personal data by the Data Controller, hereinafter referred to as Reports, should be sent to the following email address:

[sales@automationtrader.com](mailto:sales@automationtrader.com)

details of the person or persons to whom the Report relates,

the event that gave rise to the Report,

state your requests and the legal basis for those requests,

indicate the expected way the matter should be handled.

3. On our Website we collect the following personal data:

first and last name, company name, email address, phone number – these data may be processed when, as a user of our Website, you provide them to us via the contact form or chat available on the Website, as well as when contacting us by email, telephone, or traditional mail

the device IP address and potential personal data contained in Cookies – information resulting from general principles of Internet connections, such as the IP address (and other information contained in system logs), is used for technical and statistical purposes, in particular for collecting general demographic information (e.g. the region from which the connection is made). This type of data is also used for marketing and analytical purposes if consent is given under Article 173(1) of the Telecommunications Law Act,

possibly other data may be collected in the course of handling specific matters or may be provided by users of our Website via email, chat, or the contact form available on the Website, traditional mail, or by phone.

4. Each person using our Website has the option to choose whether and to what extent they want to use our services and share information and data about themselves, within the scope specified in this Privacy Policy.

5. We process personal data for the purpose of:

entering into and performing contracts related to the services we offer (Article 6(1)(b) GDPR) – in this scope the data will cease to be processed once the contract has been performed, fulfilling legal obligations incumbent on the Data Controller, in particular keeping records, issuing invoices, etc. (Article 6(1)(c) GDPR) – in this scope personal data will be deleted after the relevant legal obligations are fulfilled,

sending marketing content regarding the Data Controller and conducting website analytics in connection with the use of cookies (Article 6(1)(a) GDPR) – in this scope personal data are processed until the end of the session or deletion of cookies by the user, withdrawal of consent, or until an effective objection to processing for this purpose is submitted,

running the website (Article 6(1)(f) GDPR in conjunction with Article 173(1) of the Telecommunications Law Act) – in this scope personal data will cease to be processed upon the expiry of a Cookie, deletion of Cookies, or the end of a given session,

ongoing communication related to the operation of the Website (Article 6(1)(f) GDPR, i.e. the legitimate interest of the Data Controller) – in this scope your personal data will cease to be processed once the question is answered or the matter is resolved,

establishing and pursuing claims or defending against such claims (Article 6(1)(f) GDPR, i.e. the legitimate interest of the Data Controller) – in this scope personal data will be deleted when the claims expire, generally after a 3-year limitation period for claims.

6. The source of the personal data processed by the Data Controller are the data subjects.

7. If there is a button or feature that links to an external service, application, or social media, there is a joint controllership relationship between the Controller of this Website and the controller of the external site. Joint controllership is limited solely to the data necessary for operations related to the functioning of a given button or feature. The Controller is not responsible for the policies regarding further processing of personal data by other entities and organizations or social media service providers. Our joint controllers within this Website are:

Meta Platforms Ireland Ltd. (Facebook, Messenger, Instagram) with its registered office at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland,

Pinterest Europe Limited (Pinterest) with its registered office at 2nd Floor Palmerston House, Fenian Street, Dublin 2, Dublin, D02WD37, Ireland, D02WD37,

Google Ireland Ltd. (YouTube, Google Maps) with its registered office at Google Building Gordon House, 4 Barrow St, Grand Canal Dock, Dublin 4, D04 V4X7, Ireland,

Twitter International Unlimited Company (Twitter) with its registered office at Fenian Streets DO2 F663 Dublin, Ireland.

8. The Controller uses tools provided by Google Ireland Ltd., Microsoft Ireland Operations Ltd., Meta Platforms Ireland Ltd., and Tawk.to. As a rule, data processed as part of the use of these tools are processed on servers located within the EEA. However, entities providing these tools may be obliged to transfer data to third countries if such an obligation is imposed on them by law or is necessary due to the nature of the services provided (SaaS, hosting, etc.). The scope of transferred personal data relates to potential personal data contained in Cookies. The legal bases for processing the personal data indicated in the preceding sentence are specified in point 5(c) and (d) of this Privacy Policy. The transfer of personal data to the United States is based on the European Commission Decision of July 10, 2023 on providing an adequate level of protection by the EU-U.S. Data Privacy Framework (Article 45(1) GDPR). Our data importers, i.e. Google LLC, Tawk.to Inc., Meta Platforms, Inc., and Microsoft Corporation, meet the criteria of the decision and participate in the Data Privacy Framework program (<https://www.dataprivacyframework.gov/s/participant-search>).

9. We do not share any personal data with third parties without the express consent of the data subject. Personal data without the data subject's consent may be shared only with public law entities, i.e. authorities and administration bodies (e.g. tax authorities, law enforcement agencies, and other entities with authorization under generally applicable law).

10. Personal data may be entrusted for processing to entities processing such data on our behalf as the Data Controller. In such a case, as the Data Controller we conclude a personal data processing agreement with the processor. The processor processes the entrusted personal data only for the needs, scope, and purposes indicated in the processing agreement referred to in the preceding sentence. Without entrusting personal data for processing we could not conduct our business within the Website. As the Data Controller we entrust personal data for processing in particular to the following entities:

providers of hosting services for the website on which our Website operates,

providers of analytical and marketing tools,

other entities providing services necessary for the Data Controller to conduct its business.

11. Personal data are not subject to profiling by us as the Data Controller within the meaning of the GDPR.

12. In accordance with GDPR, every person whose personal data we process as the Data Controller has the right to:

access their personal data, as referred to in Article 15 GDPR,

be informed about the processing of personal data, as referred to in Article 12 GDPR,

rectify, supplement, update, or correct personal data, as referred to in Article 16 GDPR,  
withdraw consent at any time, as referred to in Article 7(3) GDPR,  
erase data (the right to be forgotten), as referred to in Article 17 GDPR,  
restrict processing, as referred to in Article 18 GDPR,  
data portability, as referred to in Article 20 GDPR,  
object to the processing of personal data, as referred to in Article 21 GDPR,  
where the legal basis is consent – the right to withdraw consent at any time without affecting the  
lawfulness of processing carried out on the basis of consent before its withdrawal,  
not to be subject to profiling, as referred to in Article 22 in conjunction with Article 4(4) GDPR,  
to lodge a complaint with the supervisory authority (i.e. the President of the Personal Data  
Protection Office, PUODO), as referred to in Article 77 GDPR.

13. If you wish to exercise your rights referred to in the previous point, please send a message by  
email to the email address or in writing to the correspondence address referred to in point 2 above.

14. Each identified case of a security breach is documented, and in the event of one of the  
situations specified in the GDPR or the Act, the data subjects and – if applicable – the President of  
the Personal Data Protection Office are informed of such a breach of personal data protection  
provisions.

15. In matters not regulated by this Privacy Policy, the relevant provisions of generally applicable  
law shall apply accordingly. In the event of inconsistency between the provisions of this Privacy  
Policy and the above provisions, those provisions shall prevail.