

PRIVACY POLICY FOX EVENTS SP. Z O.O.

The controller of the personal data is Fox Events private limited company („Fox Events”), based in Tomaszów Mazowiecki, Fabryczna 26 Street, 97-200 Tomaszów Mazowiecki.

Contact to the Administrator: kontakt@foxevents.pl.

The Privacy Policy governs the processing of personal data of visitors to the foxevents.pl, website who contact Fox Events via the website.

In the PP, we inform you about the legal basis for the processing of personal data, the ways in which they are collected and used, as well as the rights of the data subjects relating thereto in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 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 („RODO”).

The policy applies where Fox Events is the controller of the personal data. This applies both where Fox Events processes personal data obtained directly from the data subject and where we obtain personal data from other sources. We comply with our information obligations in both of the above cases, as set out in Article 13 and Article 14 respectively of the RODO in accordance with these provisions.

Personal data

Personal data means information about an identified or identifiable natural person. Processing personal data is basically any action on personal data, whether or not carried out by automated means, such as collection, storage, recording, organisation, modification, viewing, use, sharing, restriction, erasure or destruction. Fox Events processes personal data for a variety of purposes, and depending on the purpose, different means of collection, legal basis for processing, use, disclosure and retention periods may apply.

Legal basis, method and type of personal data processed

We take care to always indicate the necessary information in this regard to each person whose personal data we process as a data controller.

Whenever we process personal data on the basis of a legitimate interest of the controller, we try to analyse and balance our interest and the potential impact on the data subject (positive as well as negative) and the rights of that person under data protection legislation. We do not process personal data based on our legitimate interest where we conclude that the impact on the data subject would outweigh our interests (in which case we may process personal data if, for example, we have the relevant consent or are required or permitted to do so by law).

Processing of personal data of persons contacting Fox Events to obtain information about an offer or to share comments about Fox Events' services, as well as those contacting to enter into a contract with Fox Events.

We collect the following personal data from individuals who contact Fox Events to request information about the offer or to share comments about Fox Events' services, as well as those contacting to enter into a contract with Fox Events: name, job title, business address and company name, email address, possibly identification details for a communication tool e.g. Teams, Skype.

Individuals can also contact Fox Events via the contact form available on the Fox Events website. For this purpose, they provide us with data in the form of an email address, telephone number and those they voluntarily indicate in a text message (e.g. place of work). Sensitive data should not be provided in the contact form.

Legal bases for processing

We collect the above data based on the consent given by the user directing the above request to Fox Events or for the purpose of performing a contract (fulfilling a request) made by the person concerned. We may also process the data provided on the basis of a legitimate purpose of the data controller.

Processing of personal data of Fox Events customers

Due to the specific nature of Fox Events' business, the processing of data for the benefit of customers and customer-related data is governed by separate data processing entrustment agreements.

Fox Events processes personal data of its customers and potential customers. This data may also include personal data of persons related to Fox Events' customers who are not natural persons (e.g. contact persons). This type of personal data is processed in the IT systems used by Fox Events.

Contact by e-mail

The personal data you provide to us when you contact us via the e-mail address on the Site, including your name and contact details (e-mail address) are processed to the extent necessary to respond to the message received by e-mail and to contact you for this purpose.

Cookies

Virtually every website nowadays uses so-called cookies, i.e. files which are used to automatically collect personal data from website users („Cookies“). This is no different for the Fox Events website. The information obtained in this way is stored on the computer or other mobile device of the user who uses it.

The primary purposes for the use of cookies are twofold: to maintain and save the user session and to provide security (e.g. for fraud detection). In this respect, the use of cookies is essential.

To a further extent, cookies may not be essential, but they greatly facilitate the use of the website. They are used for, among other things:

- remembering the user's specific choices as to whether to display a certain message or to display it a certain number of times,
- monitoring user activity on the website,
- collect anonymous, aggregate statistics to improve the functionality of the website.

In this regard, the Administrator uses the services of external entities, the list of which evolves depending on the shape of the market and technical possibilities. These entities include:

- Google Analytics (Google Privacy Policy) – through this, the Administrator verifies a user who has previously used the website, observes traffic and user behaviour on the website.

It should be emphasised that at no stage is the user obliged to accept Cookies. It is possible, via the Internet browser, to set up a configuration that prevents Cookies from being stored on the user's computer or other mobile device. It is also possible to delete existing Cookies. However, failure to accept Cookies may adversely affect the operation of the website and, in some cases, even prevent the use of certain functions.

Access logs

Based on the analysis of access logs, the Administrator collects information on the use of the site by users and their IP addresses. The purpose of collecting this data is to possibly diagnose problems related to the operation of the server, assess the risk of possible security breaches and manage the site.

The above information makes it possible to create aggregate statistical statements, which may be disclosed to third parties (e.g. matters relating to page views).

Occasionally, an authorised state authority, in connection with ongoing investigations, may also oblige the Administrator to disclose IP information about a specific user.

Automated processing of personal data

The information we collect in connection with the use of our Site may be processed by automated means (including profiling), but this will not have any legal effect on the individual or similarly materially affect the individual. We pay particular attention to the issue of profiling and point out that:

- we do not process any sensitive data for profiling purposes,
- for the purposes of profiling, we generally process such data that we have aggregated,
- if we cannot achieve the purpose otherwise than by profiling non-anonymised or non-aggregated personal data, we use typical data for this purpose: e-mail address and IP address or cookies,,
- we profile in order to analyse or predict the personal preferences and interests of people using our Site and to tailor the content on our Site to those preferences,
- we profile for marketing purposes, i.e. to tailor marketing offers to the above preferences.

Legal Basis of Processing

The personal data of site users are processed on the basis of obligations under applicable law (all of them), consent obtained (commercial information), the need to perform a contract (fulfilment of a request) and the legitimate interest of the Administrator.

Data processing period

The length of time for which we may process personal data depends on the legal basis for Fox Events' processing of personal data. In Fox Events' applicable policies, including data retention policies, we indicate that we are never allowed to process personal data beyond the duration of the aforementioned legal grounds. Accordingly, we inform you that:

- where Fox Events processes personal data on the basis of consent, the period of processing continues until such consent is withdrawn,
- where Fox Events processes personal data on the basis of a legitimate interest of the controller, the period of processing lasts until the aforementioned interest ceases to exist (e.g. the statute of limitations for civil law claims) or until the data subject objects to further such processing - in situations where such an objection is legally possible,
- where Fox Events processes Personal Data because it is required to do so by applicable law, the periods of processing for this purpose are determined by that law (it is, for example, obliged by law to retain your Personal Data for an extended period of time, or if your Personal Data is needed to bring legal charges or to defend against legal charges, Fox Events will retain your Personal Data until the end of the relevant retention period or until the charges in question have been resolved,
- in the absence of specific legal or contractual requirements, the basic retention period for records and other documentary evidence produced in the performance of the contract is a maximum of 10 years.

When and how do we share personal data with third parties? Do we transfer data to third countries?

We only pass on personal data to others if we are permitted to do so by law. If this is the case, we include provisions and security mechanisms in the relevant contract we enter into with the third party in order to protect the data and to maintain our standards of data protection, confidentiality and security. Agreements of this kind are referred to as entrustment agreements for the processing of personal data, and Fox Events has control over how and to what extent the entity to which Fox Events has entrusted the processing of certain categories of personal data processes such data. In this regard, we point out that the recipients of the personal data that Fox Events processes as a controller of personal data may be:

- the above-mentioned entities that process personal data under contracts of entrustment for the processing of personal data (so-called processors),
- providers of services:
 - hosting,
 - digital, including cloud computing services,
 - access to communications software,
 - access to project management software.
- Fox Events' contractors and subcontractors providing software delivery services, software or hardware maintenance services used by Fox Events and the suppliers of the products we use,
- debt collection agencies (whereby we only pass on personal data to the extent that it is actually necessary for the purpose in question),
- auditors and chartered accountants, legal advisers, tax advisers,
- law enforcement authorities, regulators and other public administrations.

In the latter two cases, however, we will only transmit data if and to the extent that this is actually necessary and required by mandatory legal provisions and in a manner consistent with such provisions.

Our Partners are based in Poland or in other countries of the European Economic Area (EEA). Some of the service providers to the Administrator are based outside the European Economic Area (EEA). When transferring data outside the EEA, the Administrator takes great care. It verifies that the suppliers guarantee a high level of protection of personal data, in line with the legal requirements applicable within the EEA and the established line of case law, inter alia, the ruling of the Court of Justice of the European Union of 27 July 2020. Schrems II. Minimises the scope of data sent outside the EEA and, where SCCs (standard contractual clauses adopted by the European Commission) are used, verifies whether there is a risk of a personal data breach by entities outside the EEA. It examines, among other things, the process for securing data and whether the data shared could potentially be of interest to third countries.

Protection of personal data

Fox Events endeavours to provide measures for the physical, technical and organisational protection of personal data against accidental or wilful destruction, accidental loss, alteration, unauthorised disclosure, use or access, in accordance with all applicable legislation

Fox Events maintains an appropriate register of the processing activities and the categories of data processed, notifies the relevant authorities and the persons to whom the specific data relate of violations relating to the processing of personal data.

Your rights regarding data protection

Individuals have certain rights regarding their personal data and Fox Events, as data controller, is responsible for the exercise of these rights in accordance with applicable law. If you have any questions or requests regarding the scope and exercise of your rights, or if you would like to contact us specifically to exercise a specific data protection right, please contact us by email at: kontakt@foxevents.pl

We reserve the right to exercise the following rights upon positive verification of the identity of the person requesting the activity.

- Access to personal data - individuals have the right to access the data we hold as data controller.
- Changing personal data
- Withdrawal of consent - where personal data is processed on the basis of consent, individuals have the right to withdraw that consent at any time. We inform individuals of this right at any time consent is collected and allow them to withdraw their consent as easily as it was given.
- The right to restrict processing or object to the processing of personal data - at any time, on the grounds of their particular situation, unless the processing is required by law.

An individual may object to the processing of their personal data when: the processing of personal data is carried out on the basis of a legitimate interest or for statistical purposes, and the objection is justified by the particular situation in which he or she finds himself or herself, the personal data is processed for direct marketing purposes, including being profiled for this purpose. On the other hand, with regard to the request for restriction of data processing, we suggest that this is available, for example, when a person notices that his or her data is incorrect.

- right to request erasure of data
- the right to data portability
- raising other questions, concerns or complaints If you have any questions, concerns

or complaints regarding the content of PP or the way in which we process personal data, you can contact us on this matter.

- complaint to the President of the Office for Personal Data Protection (address: President of the Office for the Protection of Personal Data, ul. Stawki 2, 00-193 Warsaw)

Fox Event shall notify the rectification, erasure, and restriction of the processing of personal data to each recipient to whom the personal data have been communicated, unless this proves impossible or requires a disproportionate effort, including, in particular, a long lapse of time.

If, upon regular review, this proves necessary or desirable due to: new legislation, new guidelines from authorities responsible for overseeing personal data protection processes, best practices in the area of personal data protection. We also reserve the right to amend this Privacy Policy if the technology by which we process personal data changes (insofar as the change affects the wording of this document), or if the means, purposes or legal basis for our processing of personal data changes.