

Privacy Policy

The following Privacy Policy defines the *rules for storing and accessing data on User's Devices* used with the Service for the purposes of providing electronic services by the Administrator, and the *rules for collecting and processing personal data of Users*, which were provided by them personally and voluntarily via the tools available in the Service.

The following Privacy Policy is an integral part of the Service Regulations <<https://lavva.cloud/terms>>, which defines the rules, rights and obligations of Users using the Service.

§1 Definitions

- * *Service* - the internet service "lavva.cloud" operating at <https://lavva.cloud>
- * *External Service* - internet services of partners, service providers or service recipients cooperating with the Administrator
- * *Service / Data Administrator* - The Service Administrator and the Data Administrator (hereinafter referred to as the Administrator) is the company "ZAMEL Sp z o.o.", conducting business at the address: Zielona 27, 43-200 Pszczyna, Poland, with the assigned tax identification number (NIP): 638000669, with the assigned KRS number: 0000384737, providing electronic services via the Service
- * *User* - a natural person for whom the Administrator provides services electronically via the Service.
- * *Device* - an electronic device with software, through which the User obtains access to the Service
- * *Cookies (cookies)* - text data collected in the form of files placed on the User's Device
- * *GDPR* - Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)
- * *Personal data* - means information about an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
- * *Processing* - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- * *Restriction of processing* - means the marking of stored personal data with the aim of limiting their future processing
- * *Profiling* - means any form of automated processing of personal

data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements

- * ***Consent*** - consent of the person to whom the data relates means a voluntary, specific, informed and unambiguous expression of will, by which the person to whom the data relates, in the form of a statement or clear affirmative action, agrees to the processing of personal data relating to them
- * ***Personal data protection violation*** - means a breach of security leading to accidental or unlawful destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise processed
- * ***Pseudonymisation*** - means the processing of personal data in such a way that it can no longer be attributed to a specific person to whom the data relates, without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures preventing its attribution to an identified or identifiable natural person
- * ***Anonymization*** - Anonymization of data is an irreversible process of operations on data, which destroys / overwrites "personal data" making identification, or linking a given record with a specific user or natural person impossible.

§2 Data Protection Officer

Based on Art. 37 GDPR, the Administrator did not appoint a Data Protection Officer.

For matters related to data processing, including personal data, please contact the Administrator directly.

§3 Types of Cookies

- * ***Internal Cookies*** - files placed and read from the User's Device by the IT system of the Service
- * ***External Cookies*** - files placed and read from the User's Device by the IT systems of external Services. Scripts of external Services, which may place Cookies on User's Devices have been consciously placed in the Service through scripts and services provided and installed in the Service
- * ***Session Cookies*** - files placed and read from the User's Device by the Service or external Services during one session of a given Device. After the session ends, the files are removed from the User's Device.
- * ***Persistent Cookies*** - files placed and read from the User's Device by the Service or external Services until they are manually deleted. Files are not automatically deleted after the end of the Device session unless the User's Device configuration is set to delete Cookie files after the end of the Device session.

§4 Data Storage Security

- * *Cookie storage and read mechanisms* - The mechanisms for storing, reading and exchanging data between Cookies stored on the User's Device and the Service are implemented through built-in web browser mechanisms and do not allow for the retrieval of other data from the User's Device or data from other websites that the User has visited, including personal data or confidential information. The transfer of viruses, trojans and other worms to the User's Device is also practically impossible.
- * *Internal Cookies* - the Cookie files used by the Administrator are safe for User's Devices and do not contain scripts, content or information that could threaten the security of personal data or the security of the Device used by the User.
- * *External Cookies* - The Administrator makes all possible actions to verify and select service partners in terms of User's security. The Administrator chooses well-known, large partners with global social trust for cooperation. However, he does not have full control over the content of Cookie files coming from external partners. The Administrator is not responsible for the security of Cookie files, their content and their use in accordance with the license by Scripts installed in the service, coming from external Services, to the extent allowed by law. The list of partners is included in the further part of the Privacy Policy.
- * *Cookie control*
- o The User can at any time, independently change the settings for saving, deleting and accessing data saved by any website's Cookie files
 - o Information on how to disable Cookie files in the most popular computer browsers is available on the page: how to disable cookies <<https://nety.pl/jak-wylaczyc-pliki-cookie/>> or from one of the indicated providers:
 - + Managing cookie files in *Chrome* browser <<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=pl>>
 - + Managing cookie files in *Opera* browser <<https://help.opera.com/pl/latest/web-preferences/>>
 - + Managing cookie files in *FireFox* browser <<https://support.mozilla.org/pl/kb/blokowanie-ciasteczek>>
 - + Managing cookies in the *Edge* browser <<https://support.microsoft.com/pl-pl/help/4027947/microsoft-edge-delete-cookies>>
 - + Managing cookies in the *Safari* browser <<https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>>
 - + Managing cookies in the *Internet Explorer 11* browser <<https://windows.microsoft.com/pl-pl/internet-explorer/delete-manage-cookies#ie=ie-11>>
 - o The user can at any time delete all cookies saved so far using the tools of the User's Device, through which the User uses the Service.
- * *User-side threats* - The Administrator applies all possible technical measures to ensure the security of data placed in Cookie files. However, it should be noted that ensuring the security of this data depends on both parties, including the User's activity. The Administrator is not responsible for intercepting this data,

impersonating the User's session or its deletion, as a result of deliberate or unconscious User activity, viruses, Trojan horses and other spyware, which the User's Device may be or has been infected with. Users, in order to protect themselves against these threats, should follow the rules of safe use of the network <<https://nety.pl/cyberbezpieczenstwo/>>.

- * ***Storing personal data*** - The Administrator ensures that it makes every effort to ensure that the personal data processed, voluntarily entered by Users, are secure, access to them is limited and carried out in accordance with their purpose and processing objectives. The Administrator also ensures that it makes every effort to protect the data it holds from loss, by applying appropriate physical and organizational safeguards.
- * ***Storing passwords*** - The Administrator declares that passwords are stored in an encrypted form, using the latest standards and guidelines in this area. Decryption of passwords provided in the Service for account access is practically impossible.

§5 Purposes for which cookies are used

- * Improvement and facilitation of access to the Service
- * Personalization of the Service for Users
- * Enabling Login to the service
- * Marketing, Remarketing in external services
- * Ad serving services
- * Conducting statistics (users, number of visits, types of devices, links etc.)
- * Serving multimedia services
- * Providing social services

§6 Purposes of personal data processing

Personal data voluntarily provided by Users are processed for one of the following purposes:

- * Implementation of electronic services:
 - o Services of registration and maintenance of the User's account in the Service and functionalities related to it
 - o Newsletter services (including sending advertising content with consent)
 - o Services of commenting / liking posts in the Service without the need to register
- * Communication of the Administrator with Users in matters related to the Service and data protection
- * Ensuring the legally justified interest of the Administrator

Data about Users collected anonymously and automatically are processed for one of the following purposes:

- * Conducting statistics
- * Remarketing
- * Serving ads tailored to User preferences
- * Ensuring the legally justified interest of the Administrator

§7 Cookies of External Services

The Administrator in the Service uses javascript scripts and web components of partners who may place their own cookie files on the User's Device. Remember that in your browser settings you can decide for yourself about the allowed cookie files that can be used by individual websites. Below is a list of partners or their services implemented in the Service, which may place cookie files:

- * *Multimedia services:*
- o YouTube <<https://www.youtube.com/t/terms>>
- * *Social / combined services:*
- (Registration, Login, sharing content, communication, etc.)
- o Twitter <<https://twitter.com/en/tos?wcmode=disabled#intlTerms>>
- o Microsoft <<https://www.microsoft.com/en/servicesagreement/>>
- o Facebook <<https://www.facebook.com/legal/terms>>
- o Google+ <<https://policies.google.com/privacy?hl=pl>>
- * *Newsletter services:*
- o Freshmail <<https://freshmail.pl/polityka-prywatnosci/>>
- * *Ad serving services and affiliate networks:*
- o Google Adsense <<https://policies.google.com/privacy?hl=pl>>
- * *Conducting statistics:*
- o Google Analytics <<https://policies.google.com/privacy?hl=pl>>
- * *Other services:*
- o Google Maps <https://www.google.com/intl/en_be/help/terms_maps/>

Services provided by third parties are beyond the control of the Administrator. These entities may change their terms of service, privacy policies, data processing purposes, and cookie usage methods at any time.

§8 Types of collected data

The Service collects data about Users. Some data is collected automatically and anonymously, and some data is personal data voluntarily provided by Users when signing up for various services offered by the Service.

Anonymously collected data automatically:

- * IP address
- * Type of browser
- * Screen resolution
- * Approximate location
- * Opened subpages of the service
- * Time spent on the appropriate subpage of the service
- * Type of operating system
- * Address of the previous subpage
- * Address of the referring page
- * Browser language
- * Internet connection speed
- * Internet service provider
- * Demographic data (age, gender)

Data collected during registration:

- * Name / surname / pseudonym
- * Login
- * Email address
- * Avatar / Profile picture
- * Gender
- * Date of birth / age
- * IP address (collected automatically)

Data collected when signing up for the Newsletter service

- * Name / surname / pseudonym
- * Email address
- * IP address (collected automatically)

Data collected when adding a comment

- * Name and surname / pseudonym
- * Email address
- * IP address (collected automatically)

Some data (without identifying data) may be stored in cookies. Some data (without identifying data) may be transferred to a statistical service provider.

§9 Access to personal data by third parties

As a rule, the only recipient of personal data provided by Users is the Administrator. Data collected as part of the services provided are not transferred or resold to third parties.

Access to data (most often on the basis of a Data Processing Agreement) may be held by entities responsible for maintaining the infrastructure and services necessary to run the service, i.e.:

- * Hosting companies providing hosting or related services for the Administrator
- * Companies through which the Newsletter service is provided
- * Service and IT support companies performing maintenance or responsible for maintaining IT infrastructure

Entrusting the processing of personal data - Newsletter

In order to provide the Newsletter service, the Administrator uses the services of a third party - the *Freshmail <<https://freshmail.pl/polityka-prywatnosci/>>* service. Data entered in the newsletter subscription form are transferred, stored and processed in the external service of this provider.

Please note that the indicated partner may modify the indicated privacy policy without the consent of the Administrator.

Entrusting the processing of personal data - Hosting, VPS or Dedicated Servers Services

In order to run the service, the Administrator uses the services of an external hosting, VPS or Dedicated Servers provider - *OVH sp. z o.o. <<https://www.ovh.pl/ochrona-danych-osobowych/>>*. All data collected and processed in the service are stored and processed in the infrastructure of the service provider located within the European Union. There is a possibility of access to data as a result of service works carried out by the service provider's personnel. Access to this data is regulated by an agreement between the Administrator and the Service Provider.

Entrusting the processing of personal data - Website service services

In order to service the website, the Administrator uses the services of an external service provider - *Hostersi <<https://www.hostersi.pl/o-nas/polityka-prywatnosci/>>*. The personnel of the indicated entity have access to data entered by users during registration and editing of the user account and/or data related to the Newsletter service. Access to this data is regulated by an agreement between the Administrator and the Service Provider.

§10 Method of processing personal data

Personal data voluntarily provided by Users:

- * Personal data will not be transferred outside the European Union unless they have been published as a result of individual User action (e.g. entering a comment or post), which will make the data available to every person visiting the service.
- * Personal data will not be used for automated decision making (profiling).
- * Personal data will not be resold to third parties.

Anonymously (without personal data) collected data automatically:

- * Anonymously (without personal data) data will be transferred outside the European Union.
- * Anonymously (without personal data) data can be used for automated decision making (profiling).
Profiling of anonymous data (without personal data) does not have legal effects or similarly significantly affects the person whose data are subject to automated decision making.
- * Anonymously (without personal data) data will not be resold to third parties.

Some data (without identifying data) may be stored in cookies. Some data (without identifying data) may be transferred to a statistical service provider.

§9 Access to personal data by third parties

As a rule, the only recipient of personal data provided by Users is the Administrator. Data collected as part of the services provided are not transferred or resold to third parties.

Access to data (most often on the basis of a Data Processing Agreement) may be held by entities responsible for maintaining the infrastructure and services necessary to run the service, i.e.:

§11 Legal basis for processing personal data

The service collects and processes User data on the basis of:

- * 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 (General Data Protection Regulation)
 - o art. 6 par. 1 lit. a
the person to whom the data relate has consented to the processing of their personal data for one or more specific purposes
 - o art. 6 par. 1 lit. b
processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
 - o art. 6 par. 1 lit. f
processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
- * Act of 10 May 2018 on the protection of personal data (Journal of Laws 2018 item 1000)
- * Act of 16 July 2004 - Telecommunications Law (Journal of Laws 2004 No. 171 item 1800)
- * Act of 4 February 1994 on copyright and related rights (Journal of Laws 1994 No. 24 item 83)

§12 Period of processing personal data

Personal data voluntarily provided by Users:

As a rule, the indicated personal data are stored only for the period of providing the Service within the Service by the Administrator. They are deleted or anonymized within a period of up to 30 days from the end of the provision of services (e.g. deletion of a registered user account, unsubscribing from the Newsletter list, etc.)

The exception is a situation that requires securing legally justified purposes of further processing of these data by the Administrator. In such a situation, the Administrator will store the indicated data, from the time of their request for deletion by the User, no longer than for a period of 3 years in the event of a violation or suspicion of violation of the service regulations by the User

Anonymously (without personal data) collected data automatically:

Anonymous statistical data, not constituting personal data, are stored by the Administrator for the purpose of conducting service statistics for an indefinite period

§13 Rights of Users related to the processing of personal data

The service collects and processes User data on the basis of:

* *Right of access to personal data*

Users have the right to access their personal data, implemented at the request submitted to the Administrator

* *Right to rectify personal data*

Users have the right to request the Administrator to immediately rectify personal data that is incorrect or / and to supplement incomplete personal data, implemented at the request submitted to the Administrator

* *Right to delete personal data*

Users have the right to request the Administrator to immediately delete personal data, implemented at the request submitted to the Administrator. In the case of user accounts, data deletion involves anonymizing data that allows the User to be identified. The Administrator reserves the right to suspend the implementation of the request for data deletion in order to protect the legally justified interest of the Administrator (e.g. when the User has violated the Regulations or the data was obtained as a result of correspondence).

In the case of the Newsletter service, the User has the possibility to independently delete their personal data using the link placed in each sent e-mail message.

* *Right to restrict the processing of personal data*

Users have the right to restrict the processing of personal data in cases indicated in Art. 18 GDPR, including questioning the correctness of personal data, implemented at the request submitted to the Administrator

* *Right to transfer personal data*

Users have the right to obtain from the Administrator, personal data concerning the User in a structured, commonly used machine-readable format, implemented at the request submitted to the Administrator

* *Right to object to the processing of personal data*

Users have the right to object to the processing of their personal data in cases specified in Art. 21 GDPR, implemented at the request submitted to the Administrator

* *Right to lodge a complaint*

Users have the right to lodge a complaint with the supervisory authority dealing with the protection of personal data.

§14 Contact to the Administrator

You can contact the Administrator in one of the following ways

* *Postal address* - ZAMEL Sp z o.o., Zielona 27, 43-200 Pszczyna, Poland

* *Email address* - lavva@zamel.pl

* *Telephone connection* - +48 (32) 210 46 65

* *Contact form* - available at: <https://zamel.com/pl/dane-teleadresowe>

§15 Service Requirements

- * Restricting the writing and access to Cookie files on the User's Device may cause some functions of the Service to malfunction.
- * The Administrator is not responsible for any malfunctioning functions of the Service in case the User restricts in any way the possibility of writing and reading Cookie files.

§16 External Links

In the Service - articles, posts, entries or comments of Users, there may be references to external websites with which the Owner of the service does not cooperate. These links and the pages or files indicated under them may be dangerous for your Device or pose a threat to the security of your data. The Administrator is not responsible for the content located outside the Service.

§17 Changes in Privacy Policy

- * The Administrator reserves the right to change this Privacy Policy at any time without the need to inform the Users about the use and processing of anonymous data or the use of Cookie files.
- * The Administrator reserves the right to change this Privacy Policy in terms of processing Personal Data, about which it will inform Users who have user accounts or are subscribed to the newsletter service, via e-mail within 7 days from the change of provisions. Further use of the services means getting acquainted with and accepting the introduced changes to the Privacy Policy. In case the User does not agree with the introduced changes, they are obliged to delete their account from the Service or unsubscribe from the Newsletter service.
- * The introduced changes in the Privacy Policy will be published on this subpage of the Service.
- * The introduced changes come into effect at the moment of their publication.