

PRIVACY POLICY

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of the website at: www.westerncamp.pl

Data protection rules

This Privacy Policy sets out the principles of processing and ensuring the security of your personal data (as users of the website at www.westerncamp.pl, hereinafter referred to as the "Website") - in connection with the use of features or services available through the website.

In accordance with GDPR, personal data are all information about an identified or identifiable natural person (i.e. a particular adult or child), such as name and surname or personal identification number.

The data controller explains that your data is processed in accordance with the provisions of law, including:

- *provisions 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), hereinafter referred to as: "GDPR");*
- *provisions of the Act of 16 July 2004 - the Telecommunications Law;*
- *provisions of the Act of 10 May 2018 on the protection of personal data;*
- *provision of the Act of 18 July 2002 on the provision of services by electronic means.*

The Controller shall ensure the protection of your personal data by applying appropriate organisational and technical measures preventing interference with the users' privacy by third parties.

The data controller, taking into account the assumptions of Art. 5 GDPR, applies the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality for the processing of personal data.

Controller

The controller of your personal data is Michał Goczał, running a business under the name of MG - Michał Goczał, address: Oświęcimska 35, 32-640 Zator, entered into the Central Registration and Information on Business, NIP (Tax Identification Number): 5512484676, REGON (Business Registry Number): 123020289, email: biuro@westerncamp.pl

The data controller shall exercise the utmost care so that there is no breach of personal data protection, which in the light of GDPR shall be understood as security breach leading to accidental or unlawful destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data sent, stored or otherwise processed.

Processing of personal data

Your personal data shall be processed by the Controller in accordance with the provisions of law for the following relevant purposes - depending on the type of functionality of the website or the service used by the data subject (as these data come solely from the user's activity on the Controller's website, and their scope depends on which services or features the user decided to use and what services and features were/are/will be available on the website at the time of such activity of the user so that only relevant and adequate data are processed, in accordance with the principles set out in the introduction, being related solely to the user's activity and not exceeding that activity):

1. *as appropriate, pursuant to Art. 6 sec. 1 letter a) GDPR:*

- *in order to effect a free subscription to the Data Controller's Newsletter;*

1. *as appropriate, pursuant to Art. 6 sec. 1 letter b) GDPR:*

- *in order to avail of the Website's features;*
- *in order to conclude a distance contract with the Controller or to take action at the request of the data subject, before concluding a distance contract with the Controller;*
- *in order to perform the contract; including for the purposes of managing the account and solving technical problems as well as contacting the user in connection with the contract performance;*

1. *as appropriate, pursuant to Art. 6 sec. 1 letter c) GDPR:*

- *in order to fulfill legal obligations of the Controller resulting from the generally applicable regulations: including for accounting and tax purposes; in order to fulfill the obligations related to complaints (consideration of complaints and claims) regarding contracts concluded via the website; in order to provide information at the request of a state authority on the basis of special provisions, e.g. to the prosecutor's office or court;*

1. *as appropriate, pursuant to Art. 6 sec. 1 letter f) GDPR, given the legitimate interests of the Controller, in the form of the following objectives:*

- *to possibly establish, investigate or defend against any claims of data subjects (including the purpose of debt collection, court proceedings and then enforcement proceedings);*
- *for archival purposes, in order to secure information, i.e. contracts and accounting documents, if any (for the fulfillment of the accountability obligation resulting from GDPR);*
- *for analytical purposes, i.e. matching services to the users' needs; optimisation of products based on user comments, catching users' interests, technical application logs; optimisation of service processes based on the course of sales and post-sales service*

- processes, including complaints (information about the statistics related to activities carried out by the Controller can be used the Controller to improve their business);*
- to offer the Controller's products and services directly to users or in order to directly offer products and services (direct marketing) of the companies cooperating with the Controller (the Controller's partners) without using electronic communication means (the legitimate purpose is to conduct marketing activities promoting own business activity or activity of other entities);*
 - to offer the Controller's products and services directly to users or in order to directly offer products and services (direct marketing) of the companies cooperating with the Controller (the Controller's partners) with the use of electronic communication means - when on account of other applicable regulations, in particular the Telecommunications Law and the Act on the provision of services by electronic means, such activities are carried out solely on the basis of relevant consents, provided that such consents have been granted;*
 - to test user satisfaction and determine the quality of our service;*
 - to ensure security and prevent malpractice and fraud;*
 - to organize promotional campaigns, loyalty programs and campaigns in which the users can participate;*
 - to handle notifications sent using the contact form, other requests, including assurances of accountability, provided that the forms are available on the website at a given time (for a legitimate purpose of responding to requests and inquiries made through the contact form or in another form, including storage of such requests and responses to comply with the accountability principle).*

As noted above, data concerning users is related to their activity on the website, and therefore all data from website users are collected in two ways:

- information provided by the user on a voluntary basis- such data is provided by filling out the appropriate registration forms, contact forms, if they are available on the website; in the event that the provision of specified data is a precondition for concluding a contract, the category of such data shall be appropriately described;*
- information obtained while using the sites, which may include:*
- information stored in server logs - server of the Controller shall automatically save such data as page request sent by the user, date and time of request and reply, device data (e.g. hardware model), browser type, browser language, operating system,*
- information collected by the Google Analytics tool in the process of monitoring the website statistics,*
- IP address - each computer connected to the Internet has a unique number assigned, i.e. IP address; it can be used, for example, to identify the country from which a given user connects to the network,*
- cookies sent to the user's computer when visiting the website;*
- server logs - by collecting web server logs by the hosting operator operating at the site's web address.*

Data recipients

Depending on the scope and purpose of the data being processed, the data may be transferred - under provisions laid down by law- to other entities that will process them, within the scope of the processing purpose, respectively:

- 1. if the Controller performs the service or delivery (sale) of items other than by electronic means, but by way of a distance contract - to the entities carrying out postal or courier activities, if the subject of the contract was to be sent/delivered by traditional means; to banks or entities operating an electronic payment system, if the settlement of accounts is necessary, to the entities supporting the Controller in their business on their behalf in order to perform the contract; to the entities providing legal assistance - for the purpose of exercising the rights provided for by law, securing rights and pursuing claims under the contract;*
- 2. in each case, to state authorities or other entities authorized under the law, in order to perform duties imposed by law on the Controller, e.g. police, prosecutor's office, tax office;*
- 3. to the entities rendering marketing services - in order to support the Controller in the promotion of goods, organization of promotional campaigns and loyalty programs;*
- 4. to the entities operating IT systems and providing IT services - in the scope of maintaining correct system operation, updating the system, repairs as well as implementation or improvement of functionalities;*
- 5. to the entities supporting the Administrator's business at the Controller's request - including suppliers of external systems - in order to support, improve or develop business activity of the Controller;*

if personal data are processed for a specific purpose, taking into account the features that are (were) available on the website, subject to the principles of data processing specified in GDPR as well as the retention period of data to be stored.

Data can be made available to third parties only in line with the principles and within legally permitted limits.

Data retention period

Personal data shall be stored for a period which is not longer than it is necessary to achieve the objectives described above - including the proper functioning of the Controller's business, taking into account the time limits for the limitation of claims and the period justified by the need to store accounting documents in accordance with the provisions of law obliging the Controller to store documents (given the limitation period of the tax liability) and at the same time complying with the accountability principle. Data shall be stored in the following way:

- 1. data contained in contracts, powers of attorney and attachments thereto shall be kept for up to three months after the expiration of the claims imitation period under the contract;*
- 2. data provided through the forms available on the website shall be kept for a period of three years in order to maintain the accountability principle;*

3. *documents related to the warranty and complaints shall be kept for a period of one year after the warranty period ends or the complaint is considered, whichever comes later, unless the time limit described in point "a" expires earlier for reason of the limitation of claims;*
4. *data for marketing purposes in the scope of data processing based on the consent provided for by law - will be kept until the consent is withdrawn; in turn, if the data are processed on the basis of the legitimate purpose of the Controller - until the objection is made.*

At the same time, the Controller informs that in accordance with Art. 118 of the Civil Code, unless any special provision provides otherwise, the period of limitation shall be ten years, while for claims for periodic benefits and claims related to running a business - the period of limitation shall be three years. Pursuant to Art. 74 sec. 2 letter 4 of the Accounting Act, accounting evidence regarding fixed assets under construction, loans, credits and commercial contracts, claims pursued in civil proceedings or covered by criminal or tax proceedings - shall be stored for a period of 5 years from the beginning of the year following the financial year in which operations, transactions and the proceedings were finally terminated, paid off, settled or expired.

Data processing rights

The Controller shall also inform the data subject:

1. *of the right to demand from the Controller access to personal data relating to the data subject, rectification, deletion or limitation of data processing, the right to object to the processing, the right to transfer data and the right to lodge a complaint to the supervisory authority (President of the Office for Personal Data Protection);*
2. *that if the processing takes place on the basis of a statement of consent (legal basis, respectively: Article 6 sec. 1 letter a) or Art. 9 sec. 2 letter a)) - the person who has expressed such consent the right to withdraw their consent at any time without affecting the legality of the processing which was performed based on the consent before it was withdrawn;*
3. *the provision of data is voluntary. Failure to provide data necessary to conclude a distance contract, which are also necessary to settle the Controller's business activity - i.e. failure to provide data which are identified as being necessary to conclude a distance contract via the website may prevent the conclusion of such contract (providing such data is a condition for the conclusion of the contract). In the remaining scope, failure to provide data (or individual data) may hinder or prevent the correct performance of other functionalities or services available on the website.*
4. *that at the end of the data retention period - in accordance with legal provisions - personal data will be deleted;*
5. *that personal data will not be processed in an automated manner (including profiling) in a way that could result in any decisions made against the user, cause other legal effects or otherwise significantly impact the website users. As part of the activities performed, the Controller shall use cookies to observe and analyse the traffic on the website. The*

website does not automatically collect any information except for the information contained in cookies. The information thus collected are used, among other things, for: website management; identification of possible security threats; studies of aggregated users' traffic on the websites and for statistical purposes, including the use of Google Analytics tools.

- 1. that the Website may contain external links that allow its users to directly access other websites, or that cookies from other entities may be saved on your device when you are using the website, in particular from the following providers: Facebook, Twitter, Instagram, Google+, to enable you to take advantage of the website's functionality integrated with these websites. Each of the aforementioned providers sets the rules for the use of cookies in their own privacy policy, therefore the Controller shall inform that they have no influence on the privacy policy and cookie files used by these providers. For security reasons, it is recommended that before using the functionalities/resources offered by third party Internet services or sites, each user should become familiar with regulations regarding the privacy policy and the use of cookies of such third parties, if such information have been made available, or if not, contact the controller of such sites or services in order to obtain information in this regard.*

Cookies

The Controller shall inform that the website, in accordance with Art. 173 of the Telecommunications Law, uses cookies that constitute IT data, in particular text files, which are stored in the user's terminal equipment. Those files usually contain the name of the website from which they come, their storage time on the terminal equipment and a unique number. They are used for the purpose of:

- facilitating the use of website while browsing;*
- identifying a given user when the site is revisited on the device on which they are stored;*
- creating statistics that help to understand the way of using websites by the site users, which makes it possible to improve the structure and content of those websites;*
- adjusting the website content to the specific user preferences and optimizing the use of websites, tailored to individual users' needs.*

The website uses the following types of cookies: "Session Cookies" are stored in the terminal equipment until the user logs out, leaves the website or turns off the web browser, "Persistent Cookies" are stored in the User's terminal equipment for the time specified in the cookies' parameters or until they are deleted by the User; "Performance Cookies" - collect information on how the websites are used; "Strictly Necessary Cookies" - enable the use of features available on the website, "Functional Cookies" - enable memorising the user-selected settings and personalising the user interface; "First-Party Cookies" - cookies that belong to this site; "Third Party Cookies" - cookies that another party places on your device through our Website.

The Controller explains that such information is in no way linked to the personal data of the website user, nor is it used to determine the user's identity. The scope of information collected in an automated manner depends on the user's web browser settings. It is therefore recommended that the user checks their browser settings in order to find out which information is shared by their browser automatically or to change such settings. For this purpose, the user can read the contents of "Help" feature of the web browser used.

The Controller shall also explain that it is possible to change the conditions for storing or receiving cookies by changing the configuration settings in web browsers, e.g.:

- [Internet Explorer](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Chrome](#)
- [Opera](#)
- [Safari](#)

Web browser usually by default allow storing cookies on the User's terminal equipment.

Website users can therefore change the settings in that scope.

The web browser also allows the deletion of cookies as well as the option of automatically blocking cookies.

Detailed information about cookies is included in the settings or documentation of the web browser used by the user. It should be noted, however, that disabling the cookies necessary for the processes of authentication, security or maintaining user preferences, if they are available on the website, can make it difficult to use the website, and in extreme cases, it can also make it impossible to use the website (or the functionality of the website).

In addition, the Controller explains that information about certain user activities is subject to logging in the server layer. These data are used solely to administer the website and to ensure the most efficient service of hosting services. The browsed resources are identified by URL addresses. In addition, the following information might be saved: public IP address of the computer sending the request (it can be directly the user's computer); name of the client's station - identification through http protocol, if possible; username provided in the authorization process, time of request, the first line of http request, http response code, the number of bytes sent by the server, the URL of the page previously visited by the user (referer link) - in the case when the transition to the Administrator page was made through the link, information on the user's browser, information about errors that occurred during the execution of the HTTP transaction. The above data is not associated with specific users browsing the pages. The above data is used solely for the purposes of server administration.

Data Processing Control

The Controller shall make every effort to provide means of physical, technical and organizational protection of personal data against their accidental or deliberate destruction,

accidental loss, change, unauthorized disclosure, use or access, in accordance with all applicable provisions of law.

The Privacy Policy is effective starting from 11 February 2019.