

ZIELINET Website Privacy and Cookies Policy

Effective from: 2025-11-05 | Version: 2.0

I. General Provisions

1. This Privacy and Cookies Policy (hereinafter referred to as the "Policy") defines the rules for the processing of personal data and the use of cookies within the ZIELINET website, available under the domains zielinet.pl, zielinet.eu, and zielinet.com (hereinafter referred to as the "Service").
2. The purpose of this Policy is to inform the Users of the Service about what personal data is collected, for what purpose, on what legal basis it is processed, and what rights Users have in connection with this processing.
3. We care about the privacy of our Users and the security of their data, processing it in accordance with applicable laws, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter "GDPR").

II. Personal Data Controller

1. The Controller of your personal data is Wojciech Zieliński, conducting business activity under the name **ZIELINET Wojciech Zieliński** with its registered office in Warsaw (00-867) at Al. Jana Pawła II 27, NIP (Tax ID): 5291685731, REGON (Business ID): 362013143.
2. In matters related to the processing of personal data, you can contact us via e-mail: **info@zielinet.com**.

III. Purposes, Legal Bases, and Periods of Data Processing

We process your personal data for the following purposes:

1. **Handling inquiries via the contact form**
 - **Purpose of processing:** To respond to your message, present an offer, or take action at your request.
 - **Legal basis:** Art. 6(1)(f) GDPR (legitimate interest of the Controller, consisting of handling correspondence).
 - **Processing period:** For the time necessary to handle the inquiry, and subsequently for archival purposes.
2. **Conducting and recording telephone conversations**

- **Purpose of processing:** We record all telephone conversations for evidentiary purposes, to secure claims, and to improve the quality of services¹.
- **Legal basis:** Art. 6(1)(f) GDPR (legitimate interest). We inform about the recording before the conversation begins².
- **Processing period:** No longer than until the expiry of the limitation period for any potential claims.

3. Sending the E-mail Newsletter

- **Purpose of processing:** Sending commercial and marketing information to the provided e-mail address and conducting analytics (e.g., tracking opens and clicks) to improve the quality of the service³³³.
- **Legal basis:** Art. 6(1)(a) GDPR (Your voluntary consent).
- **Processing period:** Until you withdraw your consent.

4. Conducting Mobile Marketing (SMS, MMS, VMS) activities

- **Purpose of processing:** Sending commercial and marketing information to the provided phone number via mass SMS, MMS, VMS, or RCS campaigns⁴⁴⁴⁴.
- **Legal basis:** Art. 6(1)(a) GDPR (Your voluntary, separate consent).
- **Processing period:** Until you withdraw your consent.

5. Maintaining a User Account and operating the Client Zone

- **Purpose of processing:** Enabling registration (including First Name, Last Name, E-mail, Password, **Market, Preferred Language**⁵, and optionally Phone Number), account verification via activation link, logging in, and providing services within the Client Zone.
- **Legal basis:** Art. 6(1)(b) GDPR (necessity to perform the User Account agreement).
- **Processing period:** For the duration of having an Account in the Service.

6. Sending System Notification SMS

- **Purpose of processing:** Sending transactional (system) notifications to the phone number provided by the User, related to the operation of services (e.g., "Hello, [name], your account is active.")⁶⁶⁶⁶.
- **Legal basis:** Art. 6(1)(f) GDPR (legitimate interest of the Controller, consisting of informing about the status of the provided service).

- **Processing period:** For the duration of having an Account in the Service.

7. Recruitment processes

- **Purpose of processing:** To conduct the recruitment process in the /career/ section.
- **Legal basis:** Art. 6(1)(c) and Art. 6(1)(a) GDPR.
- **Processing period:** Until the end of the recruitment process or for the period for which consent was given.

8. Analytical and statistical purposes (Website)

- **Purpose of processing:** Analysis of traffic and User behavior on the Service (e.g., Google Analytics ^{4 7}, Microsoft Clarity ⁸).
- **Legal basis:** Art. 6(1)(a) GDPR (Your voluntary consent for cookies).
- **Processing period:** In accordance with the cookie settings.

9. Marketing, remarketing, and B2B client identification purposes

- **Purpose of processing:** Displaying personalized ads and identifying companies whose employees visit our Service (e.g., Google Ads ⁹, dmsales.com Tracking Script ¹⁰).
- **Legal basis:** Art. 6(1)(a) GDPR (Your voluntary consent for cookies).
- **Processing period:** In accordance with the cookie settings.

IV. Data Recipients

1. Your personal data may be transferred to the following categories of recipients (processors):

- Hosting and IT service providers.
- **Email Labs** (handling all e-mail dispatches: transactional and E-mail Newsletters, and providing e-mail analytics)¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹.
- **SMSAPI** (handling the dispatch of System Notification SMS and Mobile Marketing campaigns)¹²¹²¹²¹².
- **dmsales.com** (fulfilling the function of the tracking script, only with your consent)¹³.
- Providers of analytical and marketing tools (Google LLC, Microsoft, Meta Platforms, Inc., LinkedIn Corporation).
- Technology partners (e.g., Peoplefone Polska S.A.).

2. Access to your data within our organization may be granted to authorized employees and associates (e.g., from the Customer Service Department) to the extent necessary to perform their duties.
3. We require our partners and personnel to apply an appropriate level of data protection and confidentiality.

V. Transfer of Data outside the European Economic Area (EEA)

1. In connection with the use of tools provided by Google, Microsoft, Meta, and LinkedIn, your personal data may be transferred to third countries (mainly the USA).
2. Data transfer is based on standard contractual clauses approved by the European Commission, which aim to ensure an adequate level of protection for your data.

VI. User Rights

In connection with the processing of your personal data, you have the following rights:

1. The right to access your data.
2. The right to rectify (correct) your data.
3. The right to erase your data ("the right to be forgotten").
4. The right to restrict processing.
5. The right to data portability.
6. The right to object to processing.
7. The right to withdraw consent at any time.
8. The right to lodge a complaint with a supervisory authority – the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych).

VII. Cookies and Tracking Technologies

1. The Service uses cookies. We employ an advanced, translatable consent management banner that allows you to make an informed decision about which categories of cookies you consent to¹⁴.
2. We use the following types of cookies and technologies in the Service:
 - **Necessary:** Essential for the proper functioning of the website.
 - **Analytical:** Allow us to analyze traffic on the site (e.g., Google Analytics 4¹⁵, Microsoft Clarity¹⁶). Installed only after obtaining your consent.

- **Marketing:** Used to personalize marketing and advertising activities (e.g., Google Ads tags ¹⁷ and the dmsales.com identification script ¹⁸). Installed only after obtaining your consent.
3. You can manage your cookie consents at any time using the cookie banner settings available in the Service.

VIII. Related Legal Documents

This Policy is part of a set of legal documents governing the operation of the Service. Other documents referenced by the Service include¹⁹:

1. **Terms of Service**
2. **Security Policy**
3. **Accessibility Statement**
4. **Security Researcher Acknowledgements**

IX. Final Provisions

1. This Policy is regularly reviewed and updated as necessary.
2. Each version of the Policy is marked with a version number and an effective date. Previous versions are available for inspection in the public archive of legal documents²⁰.
3. In matters not regulated by this Policy, the relevant provisions of Polish law shall apply.