

Privacy Policy and obligation information of PANEK S.A.

General information

1. This Privacy Policy and obligation information of PANEK S.A. (hereinafter: "Policy") informs about the ways and principles concerning the processing of personal data of Users of services offered by PANEK S.A. and persons visiting the websites www.panekcs.pl and www.ipanek.pl.
2. At PANEK S.A., we attach particular importance to respecting the privacy of all persons, therefore, the personal data of Users of the services offered by us and information about persons visiting our websites are used only for the purposes for which they have been collected for no longer than is necessary to achieve those purposes.
3. PANEK S.A. reserves the right to make changes, modify the functionality or properties of websites administered by the Company, transfer the rights to the sites and perform all legal actions allowed by applicable laws. Any changes to the websites administered by the Company made by PANEK S.A. cannot violate the rights of their Users.

Dictionary of terms

Administrator; Data Administrator – PANEK S.A.,

Personal data – means any information relating to 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,

User – means any person who visits the Administrator's websites or makes use of its services.

Links to other websites and services

1. In the case of placing links to other websites or services on websites administered by PANEK S.A., we are not responsible for the privacy management rules that apply on them.
2. After entering the websites or services to which links are provided on the websites of PANEK S.A., we recommend that you familiarize yourself with the privacy policies and information obligations placed on them.

Cookie files

1. On our websites PANEK S.A. does not try to identify Users and this is not our goal. The exception are forms dedicated to contact and make reservations, which are voluntary.
2. The websites administered by PANEK S.A. or some of their elements may use cookies files (so-called "cookies"). These are small files containing IT data, in particular text files that are stored on the User's end device from which the website is viewed (e.g. computer, telephone, laptop, tablet, etc.).

3. Cookies allow, among other things, to adjust the browsed website to the needs and preferences of the User and are also used by PANEK S.A. for statistical purposes. Cookies are not used to identify Users and on their basis the identity of the person browsing the website is not established.
4. Cookies used on www.panekcs.pl and www.ipanek.pl are not harmful to the User's end device. Most web browsers accept the saving of cookies by default.
5. In order to make a change in the use of cookies it is necessary to change the settings of the browser used by the User. The way of changing the use of cookies varies depending on the type of browser. Detailed information on how to delete cookies should be found in the tab of the Internet browser used by the User.
6. The websites managed by PANEK S.A. use two types of cookies:
 - "session" - temporary files, which are stored in the User's terminal device until the User logs out or leaves the website,
 - "permanent" - files stored in the User's end device for the time specified in the parameters of the User's browser or until their physical deletion by the User.
7. PANEK S.A. analyses activity on its websites in the form of profiling with the use of cookies in order to create and present you with dedicated offers tailored to your preferences as much as possible. Their result may be a favorable, temporary offer addressed to you on the basis of the history of use of our services and behavior on websites administered by PANEK S.A.
8. With the use of cookie technology used on our websites it is possible to get acquainted with Users' preferences (e.g. by analyzing how often they visit our website or what products they see most often), thanks to which PANEK S.A. can present a customized advertisement to a User and create and present offers designed for him.
9. The settings of the browser used by the User allowing the storage of cookies means that the User agrees that these files are stored on his terminal device.
10. The User has the possibility at any time to determine the conditions for the use of cookies and to limit the access of PANEK S.A. to them using the settings of his Internet browser.
11. In the event of disagreement with the collection of data through cookies, the User may at any time block the placement of these files using the options available in his Internet browser or delete them.
12. Blocking or deleting cookies can make it difficult to use www.panekcs.pl and www.ipanek.pl or even impossible to use some of their options.
13. PANEK S.A. does not collect cookies from Users of the websites it administers in order to identify them, but monitors information about them using the Google Analytics tool, which helps to analyze Users' behavior. Google Analytics collects information anonymously, which does not allow the identification of the data subjects.
14. Every User who does not agree to the use of cookies is obliged to modify the settings of his browser. Configuration of the system enabling the use of cookies means consent for the Service Provider to store the information referred to in paragraph 2, in accordance with Article 173 paragraph 2 of the Act of 16 July 2004, Telecommunication law.

Data protection and obligation information

- In order to ensure the integrity, availability and confidentiality of personal data, the Administrator has implemented procedures that allow access to personal data only to authorized persons and only to the extent necessary to perform their official activities. The Administrator applies organizational and technical solutions in order to ensure safe and lawful processing of personal data.
- Data Administrator:
 - In accordance with Article 13(1) and (2) of Regulation 2016/679 of the Parliament and of the Council (EU) 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 (hereinafter: "Regulation"), we inform that the Administrator of your personal data is PANEK S.A. with its registered office in Warsaw, 208 Grójecka Street, 02-390 Warsaw.
- Contact to the Data Administrator:

| Communication channel | Rent a Car (www.ipanek.pl) | Car Sharing (www.panekcs.pl) |
|-----------------------|--|---|
| e-mail | bok@panek.eu | bok@panekcs.pl |
| telephone | (+48) 665 800 000 | (+48) 690 20 20 20 |
| address | PANEK S.A. Grójecka 208 st. 02-390 Warsaw | PANEK S.A. Grójecka 208 st. 02-390 Warsaw |

- Contact to the Data Protection Officer of PANEK S.A.:

| | |
|---------|---|
| Name | Kamil Mieszczankowski |
| address | PANEK S.A. Grójecka 208 st. 02-390 Warsaw with an annotation „IOD” |
| e-mail | iodo@panek.eu |

- In providing our services we collect the following personal data:

| Rent a Car (www.ipanek.pl) | Car Sharing (www.panekcs.pl) |
|--|---|
| name and surname | name and surname |
| social security number (PESEL) | social security number (PESEL) |
| telephone number | telephone number |
| e-mail address | e-mail address |
| residence | residence |

| | |
|--|--|
| place and date of birth | place and date of birth |
| number and expiration date of driving license | number and expiration date of driving license |
| ID number | ID number |
| geolocation data | geolocation data |
| company name and address | company name and address |
| NIP number | NIP number |
| credit/payment card number and expiration date | credit/payment card number and expiration date |
| the image of person (in case of rental at a Customer Service Point; removed after 7 days) | image and obverse of the driving license (selfie with a document removed up to 48 hours after account activation) |

6. PANEK S.A. processes your personal data for purposes:
- concluding and implementing the Agreement(s) connecting you with PANEK S.A. in accordance with Article 6(1)(b) of the Regulation,
 - send answers to your applications and notifications, information about promotions and competitions via e-mail, SMS, MMS or in a mobile application in accordance with Article 6(1)(a) of the Regulation,
 - marketing of goods and services of PANEK S.A. and satisfaction surveys of services provided in accordance with Article 6(1)(f) of the Regulation,
 - conducting operating activity of PANEK S.A. (e.g. analyses, reports, statistics, verification of payment reliability, etc.) in accordance with Article 6(1)(f) of the Regulation,
 - securing the property owned by PANEK S.A., in particular to locate the car in case of its loss, misappropriation or theft and to verify the proper implementation of the Agreement by the Client in accordance with Article 6(1)(f) of the Regulation,
 - determine, defend and pursue claims in accordance with Article 6(1)(f) of the Regulation,
 - fulfilling the legal obligations incumbent on PANEK S.A. resulting from other legal regulations (e.g. providing information to the authorities entitled to request it, fulfilling court decisions, cooperation with insurers, etc.) in accordance with Article 6 section 1 point c) of the Regulation,
 - the implementation of the recruitment process and the performance of the related obligations arising from the provisions of law related to the recruitment process, in particular from the Act of 26 June 1974 Labour Code (Article 6.1.c RODO),
 - archives in accordance with Article 6(1)(c) of the Regulation.
7. PANEK S.A. entrusts the processing of personal data to the following processing entities::
- Softra Systemy Informatyczne
Św. Michała 43 st.

61-119 Poznań,

- Systell Systemy Contact Center

Pułtуска 10 st.

61-052 Poznań,

- Beyond.pl Sp. z o.o.

A. Kręglewskiego 11 st.

61-248 Poznań.

8. The recipients of your personal data may be:
 - persons and entities authorized by PANEK S.A. providing services for the Administrator's business activity (our employees, associates, business partners, service providers, especially in the field of IT etc.),
 - authorized state authorities, insurers and other institutions on the basis of applicable laws,
 - business information companies,
 - the buyer of receivables,
 - business partners, in case of consent.
9. If PANEK S.A. processes personal data on the basis of a legitimate interest of PANEK S.A., personal data will be processed until there is a legitimate interest in processing personal data for a specific purpose, however, the data will not be processed if the Client raises a legitimate objection to such processing, and PANEK S.A. does not demonstrate the existence of valid legal grounds for processing or grounds for establishing, pursuing or defending claims.
10. PANEK S.A. processes personal data:
 - until the withdrawal of consent, when the basis for processing is consent,
 - until the statute of limitations for claims under the contract, where the processing is based on the contract,
 - until the moment required by law, when the processing is carried out on the basis of the legal obligation imposed on the administrator,
 - in connection with cookie technology - personal data will be processed until these files are deleted by means of the settings of your browser or other device.
11. In the case of the User's consent to make his personal data available to PANEK S.A. business partners, the scope of the data provided will include (depending on the car used): driving data (engine temperature, speed and over speed, speed limits, handbrake use, car charge level, battery voltage, open doors, fuel level, overloads, stops, etc.), date of use, driving time, distance, GPS/CAN location, user's driving route, account registration date, date of birth, e-mail, first and last name, driving license category, address of residence / registration, country, account turnover, activity in using the service, PESEL number, gender, e-mail address, number and expiration date of driving license, telephone, arrears, software type (iOS/Android).
12. PANEK S.A. will store your data only for the time necessary to fulfill the purposes specified in point 6 above and will store them for the time necessary to fulfill the Agreements and obligations between the Parties, the period of limitation of claims under the law and the period of storage of documents for tax, accounting and archival purposes.

13. PANEK S.A. shall cease the processing of personal data if you submit a justified objection to such processing and the Data Administrator fails to demonstrate the existence of valid legal grounds for processing or grounds for establishing, pursuing or defending claims.
14. Your personal data is voluntary, but necessary for the conclusion and implementation of the Agreement between the Parties.
15. You have the right to:
 - access to your data and receive a copy,
 - withdrawal of consent to the processing of personal data (withdrawal of consent does not affect the lawfulness of the processing which was made on the basis of consent before its withdrawal),
 - rectification(s) of their data if they are erroneous or outdated, as well as the right to delete them if the processing of the data does not take place on the basis of the given consent, for the purpose of fulfilling an obligation arising from a legal provision or in the exercise of public authority,
 - restrict or object to data processing (subject to points 16 and 17 below),
 - to file a complaint with the supervisory authority.
16. The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her based on Article 6(1)(e) or (f), including profiling on the basis of these provisions. The controller shall no longer process those personal data unless he or she demonstrates that there are compelling legitimate grounds for processing overriding the interests, rights and freedoms of the data subject or grounds for establishing, pursuing or defending claims.
17. Where personal data is processed for the purposes of direct marketing, the data subject has the right to object at any time to the processing of personal data relating to him/her for the purposes of such marketing, including profiling, to the extent that the processing is related to such direct marketing.

Final provisions

1. PANEK S.A. applies policies and procedures to protect personal data against unauthorized loss, misuse, change or destruction in accordance with the applicable laws.
2. PANEK S.A. reserves the right to change the content of this Policy, in particular, in the case of changes in the applicable provisions of law, new guidelines of supervisory bodies responsible for supervising compliance with the law and safe processing of personal data and implementation of best practices applied in the area of personal data protection. The User will be informed about such change by posting the new content of the Policy on the appropriate website.
3. In the event of any contradictions or doubts between the content of the Policy and the consents granted by the Client, regardless of the content of the Policy, the basis for PANEK S.A. to undertake and define the scope of activities are the consents granted voluntarily by the User or generally applicable legal regulations.
4. This document is of a general and informative nature, it is not the source of the User's obligations, and in particular does not constitute any Agreement or Regulations.
5. This Policy is effective from 3 November 2020.