Privacy policy of EMT-Systems Sp. z o.o.

This privacy policy („**Policy**") describes personal data gathered or generated (processed) during visits to our website emt-systems.pl („**Website**"). The Policy defines types of personal data gathered during visits to our Website and how they are used, shared and protected. The Policy defines choice options for the users regarding their personal data and channels of communication with EMT-Systems.

WHICH personal data we collect and WHEN we do it

EMT-Systems asks the users to provide certain personal information in connection with providing services ordered by the user. The examples of such situations are the following actions: sending application forms for training courses, contacting a customer service department, correspondence requests, and participation in events or contests organized by EMT-Systems or other interactions with the Website. The above mentioned information includes:

- o contact information, including first and last name, e-mail, phone number, shipping address and billing address,
- o personal data, including place of residence, date of birth and history of participation in training courses,
- o relevant payment information,
- o photos and videos,
- o personal preferences, such as training needs, as well as marketing preferences concerning *cookie* files.

Tools to manage the information collected by EMT-Systems

In many cases, the browser provides additional tools allowing the user to control gathering or sharing particular categories of information, for instance they may offer the user tools that allow managing the use of *cookie* files. We recommend learning about the tools available in user's device and to use them.

WHY AND HOW EMT-Systems uses (processes) user's personal data?

To provide Website functions and services requested by the user

When the user visits the Website emt-systems.pl, the user's data will be used to provide the chosen services. For instance, it uses contact data provided by the user for the purposes of communication with the customer regarding the chosen training services, event or special deals. When the customer contacts customer service, EMT-Systems will use certain information about the user, such as history of participation in training courses, to help the user solve the reported problem or issue.

To send information about services, events or for other marketing purposes

In order to modify user's contact preferences (consent to contact by phone or to receive e-mails) or opt out of receiving further correspondence from EMT-Systems, the user shall click the opt-out link added at the bottom of each newsletter or send the resignation e-mail message to info@emt-systems.pl.

In case of users who are existing customers of EMT-Systems (including customers, who have participated in our courses), EMT-Systems may use the provided e-mail address to send marketing correspondence about similar services provided by EMT-Systems, unless the user opts out of receiving such correspondence. In remaining cases, EMT-Systems requests user consent to send marketing information about products, services, events and special deals by EMT-Systems. In cases, where it is legally required, EMT-Systems shall ask the users to provide consent to receive marketing materials.

For the needs of operating activities of EMT-Systems

EMT-Systems may use the submitted data and information for the needs of business activities. For instance, when the customer books the course, EMT-Systems may use the information gathered thereby for accounting, audit and other internal purposes.

For general research and development reasons

EMT-Systems uses data concerning the way visitors use the Website in order to better understand their behavior and preferences. For instance, EMT-Systems may use the information concerning the manner visitors to emt-systems.pl search and find products/services in order to better understand the optimum method to arrange and present company's product portfolio on our website.

Other purposes

EMT-Systems may also use users' personal data otherwise and will in each case notify the users at the moment of data acquisition and – where it is needed – request the user's consent.

SHARING user's personal data

EMT-Systems shares user's personal data:

- o to external service providers processing personal data on behalf of EMT-Systems, for example for the needs of processing data connected with payments, data management, e-mail distribution, research and development work and administration of the selected services and functions,

o   remaining third parties in the scope necessary to: (i) comply with demands submitted by public authorities, court orders or due to provisions of law; (ii) defend EMT-Systems against claims by third parties

o   EMT-Systems may also transfer personal data gathered on particular user in case of selling or disposing of the entire or part of the assets of EMT-Systems (in case of reorganization, division or dissolution of the company).

PROTECTION of user's personal data and MANAGEMENT

o   **Encrypting and safety:** EMT-Systems uses a series of technical and organizational safety measures, including encrypting and validating tools, with users' personal data safety in mind. User's personal data is stored in the protected networks and available solely to the limited number of people that possess appropriate rights of access to the above mentioned systems.

o   **Rules on storing user's data:** Unless otherwise provided by law, EMT-Systems stores user's personal data as long as it is necessary for the purposes the data has been collected for, however not longer than 5 years after customer's last interaction with EMT-Systems.

Cookie FILES and pixel tags

When the visitor uses the Website, EMT-Systems downloads and saves information from their browsers that may contain their personal data. For the collection of such data EMT-Systems uses a series of methods, including *cookie* files and pixel tags that may feature (i) user's IP address; (ii) unique *cookie* file ID, information about *cookie* files, as well as information on whether the device used by the visitor has installed software providing access to certain functions; (iii) unique device ID and its type; (iv) domain, type of browser and selected language of communication, (v) operation system and its settings; (vi) country and time zone; (vii) previously visited websites; (viii) information on the user's interaction with our Websites, such as data for click analytics, information on purchasing history as well as demonstrated preferences; and (ix) access time and *referring URLs*.

Third parties may also collect information via Websites in the form of *cookie* files, so called *plug-ins* and widgets. The above mentioned third parties download data directly from user's internet browser and processing of these data is subject to the policy of the mentioned third parties.

EMT-Systems uses *cookie* files and pixel tags to track the manner our customers use the Website and to better understand our customer's preferences. In addition, EMT-Systems uses *cookie* files and pixel tags in order to acquire aggregated data on the traffic and interactions on the Website, identify trends and acquire statistical data enabling optimization of EMT-Systems Website. Generally, we use three categories of *cookie* files on the Website:

o **functional files:** these *cookie* files are needed to ensure fundamental functionality of the website and, for this reason, they are usually turned on. This category includes *cookie* files, since they are necessary to ensure basic functionality of the website and hence they are always enabled. This category includes files enabling remembering the user during their activity on websites within one session or – upon user's request – during subsequent sessions or to use chat.

o **functionality enhancing files**: This type of *cookie* files allow enhancing functionality of the Website by monitoring the way it is used by visitors. In some cases, this type of *cookie* files increase the speed of Emt-Systems' response to user's needs and enable us to remember website's settings selected by the user. No consent given to processing this type of *cookie* files may lead to recommendations that do not meet user's needs and may slow down the website.

o **social and advertisement files**: *Cookie* files from social media offer the possibility to redirect the user to social media they use. Advertisement *cookie* files (managed by third parties) gather information with a view to better adjustment of displayed ads to user's preferences. In some cases, using these files entails processing of user's personal data.

Cookie files installed on the Website:

- Google AdWords Conversion
- Google Analytics
- googletagmanager
- Facebook Connect
- Yandex.Metrics
- Smartsuppchat chat

In order to view a comprehensive and up-to-date list of all third parties having access to user's internet browser, EMT-Systems recommend installing a dedicated plug-in in user's browser. Furthermore, the user may choose the option, where the computer will display a suitable warning each time *cookie* file is sent, or alternatively disable all *cookie* files. It can be done by going to browser's settings and selecting the suitable option in every browser and on every device of the user. Browsers differ and so we recommend the users to read the „Help" menu in their browsers in order to determine the best way to modify settings relating to *cookie* files.