

## **OPTOUT**

Users who do not want their visit data to be collected by our system can use the opt-out mechanism. If the option is activated, your data will not be collected and evaluated online. The opt-out mechanism uses a cookie. If the cookie is deleted, you can reactivate the opt-out.

## **Privacy policy**

### **I. General Information**

With the following information you will get a simple overview of what happens with your data when you visit websites with the advertising technology we use. Here you will find all the information about the data collected by Euvic360e-com sp. z o.o. with its registered office in Warsaw, at ul. Czerska 12, 00-732 Warsaw – the owner of the Clickonometrics platform – in the course of providing advertising services, in particular what kind of data it is, how it is collected and how it can be deleted from our advertising systems.

Euvic360e-com sp. z o.o. provides online advertising services to advertisers by offering a tool to display advertisements for their services or products on the websites and mobile applications of the publishers you visit. The Clickonometrics platform allows you to administer your online advertising campaigns and portal ads. The ads are personalised, meaning they use information about your previous online activities. This allows us to display personalised content based on your activity on the website and to better understand the needs of our visitors.

### **II. Personal Data Controller**

1. The Personal Data Controller and processor of the personal data of the users collected, inter alia, through the Euvic360e-com website at [www.clickonomtetrics.com](http://www.clickonomtetrics.com) (the “Website”) and the Clickonometrics tool is the company Euvic360e-com sp. z o.o., with its registered office in Warsaw, ul. Czerska 12, 00-732 Warsaw, registered in the Register of Entrepreneurs of the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under KRS No.: 0000431214, NIP: 5272491776, REGON: 140328367, share capital of: PLN 239,467.60, e-mail address: [kontakt@euvic360e-com.pl](mailto:kontakt@euvic360e-com.pl).
2. Euvic360e-com is also a service provider within the meaning of Article 2(6) of the Act of 18 July 2002 on the provision of electronic services. (Journal of Laws 2013 No. 0 item 1422 as amended).
3. Euvic360e-com applies technical and organisational measures to ensure the protection of personal data processed, appropriate to the risks and categories of data to be protected, and in particular to protect the data against disclosure to unauthorised persons, appropriation by unauthorised persons, processing in breach of the law and alteration, loss, damage or destruction.
4. Euvic360e-com complies with its obligations under Regulation (EU) 2016/679 of

the European Parliament and of the Council of 27 April 2016 and the Law of 18 July 2002 on the provision of electronic services. (Journal of Laws 2013 No. 0 item 1422 as amended).

### **III. What information we collect and why?**

1. User data provided in contact forms on the websites.

There are registration forms on the pages of the service which only contain the necessary data (name, email address, telephone number) for Euvic360e-com. The personal data you provide in the contact form will only be processed for the purpose of answering the question posed in the contact form and will not be processed by us for longer than necessary for the provision of the service in question or in accordance with applicable law.

2. Cookie data.

We use cookies, which are text files that are collected by your browser when you visit websites or applications of advertisers or publishers, to collect your data. We use cookies to collect data from your browsers (from advertisers and publishers) which is used to collect information such as IP addresses, web browser addresses and timestamps. We collect anonymous cookie data that we classify into user segments using analytics and benchmarking tools, allowing advertisers to better customise ads to specific users. The data obtained enables us to determine your buying habits, present personalised advertising and obtain information about the placement of our advertising.

For a complete list of the categories of data processed by Euvic360e-com, please refer to point. IV of this Privacy Policy.

### **IV. Information Obligation**

In accordance with Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (“GDPR”), we notify you that:

- 1) the data controller of your personal data is Euvic360e-com, located in Warsaw, ul. Czerska 12, 00-732 Warsaw, email kontakt@euvic360e-com.pl, phone 22 26 10 300;
- 2) you may contact the Data Protection Officer, who can be contacted:
  - a) by e-mail: g.dobrominski@euvicperformance.pl
  - b) regular mail: Inspektor Danych Osobowych Euvic360e-com. ul. Czerska 12, b0-732 Warszawa.
- 3) your personal data will be processed for the following purposes:
  - a) to answer a question via the contact form - the legal basis for the processing of personal data is Article 6(1)(f) GDPR.
  - b) to save and access certain information on your device (e.g. cookies or device identifiers) in order to perform the following:

- i. select and display personalised advertising,
- ii. measure the effectiveness of advertising,

The legal basis for the processing of your personal data is the consent given by you on the websites or applications of the publishers - Art. 6(1)(a) GDPR,

- iii. to ensure safety and prevent fraud - the legal basis for the processing of personal data is the legitimate interest of Euvic360e-com based on Art. 6(1)(f) GDPR.

- 4) Source of data – We receive your data either from publishers on whose digital platforms we display our advertising or from platforms that work with publishers to deliver personalised advertising.
- 5) Categories of data – Euvic360e-com will process the following categories of your personal data:
  - a) the data provided in the contact form – name, e-mail, telephone number;
  - b) an online identifier (e.g. cookie ID or mobile advertising ID);
  - c) the URLs of the websites you visit;
  - d) data relating to ad views and your interactions with ads on publisher websites or apps;
  - e) technical information about your browser or device;
  - f) timestamp;
  - g) an IP address indicating the approximate location.
- 6) Recipients of the data – we may share your data with our processors who may process data under contract with us and only in accordance with our instructions. We may also share limited amounts of data with our business partners.
- 7) Your personal data will be stored within a maximum period of 2 years.
- 8) Profiling – Euvic360e-com carries out profiling in relation to data associated with your activity on advertisers' websites or apps (i.e. in relation to data processed by us on behalf of and on behalf of advertisers as data processors). We profile your data in order to display advertisements that we believe are appropriate to your shopping habits.
- 9) User's rights:
  - a) right to withdraw consent to processing at any time, which shall not affect the lawfulness of the processing prior to the withdrawal of consent;
  - b) right to object to the processing of personal data for direct marketing purposes or on grounds relating to the specific situation of the user where the legal basis for the processing of personal data is the legitimate interest of the data controller;
  - c) right to access their personal data;
  - d) right to restrict processing by the data controller;
  - e) right to request rectification of personal data if they prove to be inaccurate or out of date;
  - f) right to request the deletion of personal data if the storage of such data is no longer necessary;
  - g) right to request the restriction of further processing if there is a dispute about the lawfulness or the processing of the personal data,
  - h) right to have personal data transferred by us and, where applicable, to have the data transferred directly to another data controller. You have the right

- to request a copy of the personal data we process,
- i) right to file a complaint with the supervisory authority – the President of the Office for Personal Data Protection, <https://www.uodo.gov.pl/pl/p/kontakt>, ul. Stawki 2, 00-193 Warsaw.

## V. Security of information

We attach great deal of importance to data security. Therefore, we make every effort to protect our service from unauthorised access by third parties and control the methods used to collect, store and process information. We use firewalls, server security devices, encryption devices and physical security measures, among others. We only grant access to data to those employees and entities that need to have access to the data for processing solely for the purposes described in the Privacy Policy.

## VI. Opt-out of targeted advertising

We use cookies in the provision of our services. If you do not agree to our use of cookies or wish to limit the scope of our use of cookies, you can opt out of using our website or change your browser settings. However, please note that because of the widespread use of cookies, disabling them may prevent you from using many websites. Please refer to your browser's instructions to learn how to disable tracking mechanisms such as cookies and others. You can find more information on the following pages, for example:

Mozilla: <https://support.mozilla.org/pl/kb/usuwanie-ciasteczek>

Chrome:

<https://support.google.com/chrome/answer/95647?hl=pl>

Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>

Safari: <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>

Opera: <https://help.opera.com/pl/latest/web-preferences/>

Euvic3603-com offers you - independently of this - the possibility of refusing to receive cookies from our advertising system. This can be done with a so-called “opt-out” cookie, which prevents such files from being deposited on your computer. This option prevents certain information from being associated with your browser. However, please note that if you use multiple web browsers or multiple computers, you will need to perform the cookie opt-out operation on each of these browsers/computers separately. Furthermore, if you delete the “opt-out” cookie from your browser or computer, the entire process must be repeated. To opt-out of personalised advertising, click on the “OPT-OUT” button at the beginning of this privacy policy in the upper right corner.

For mobile devices, you need to change the device settings.

- For iOS, select “Privacy” → “Advertising” → “Restrict ad tracking”.
- For Android, select “User” → “Google” → “Advertising” → “Waive advertising personalisation”.

## **VII. Changes to this Privacy Policy**

Euvic360e-com may deem it appropriate or necessary to update this Privacy Policy. We reserve the right to make changes at any time. We will notify you of material changes to the Privacy Policy by posting a notice on our website.

## **VIII. Contact with Euvic360e-com**

If you have any questions or concerns regarding the Privacy Policy, please contact our Privacy Officer at the address below:

Data Protection  
Officer  
Euvic360e-com  
sp.z o.o.  
ul. Czerska 12  
00-732 Warszawa  
E-Mail:  
[g.dobrominski@euvicperformance.pl](mailto:g.dobrominski@euvicperformance.pl)

