

SELESTO PLATFORM PRIVACY POLICY AND COOKIES

This Privacy Policy of the SELESTO Platform (hereinafter: the Policy) aims to ensure compliance with the law and defines the rules for the processing of personal data, the rules for storing and accessing information on the User's device using cookies, used to provide electronic services requested by the User - by the Administrator. All persons using the SELESTO Platform should read it before using the services, which is confirmed in the service ordering process. If you do not consent to the processing of personal data as presented below, do not provide personal data when ordering the service and do not provide any documents containing such data.

This Policy comes into force on May 25, 2018.

1. Definitions

The definitions adopted in this Privacy Policy have the following meanings:

- a) Administrator, Website Operator - Selesto Sp. z o.o. operating at the address: Ul. Grzebieniowa 16c / 1, 26-600 Radom, identification number NIP: 9482612159, alternatively referred to as the Service Provider, who stores and accesses information on the User's devices.**
- b) USER** - entrepreneur (entity not being a consumer) who uses the services of the Website Operator - the SELESTO Platform
- c) Placing an order for a service** - filling in the form and sending it by the User on the website www.selesto.pl, after prior acceptance of the Regulations and this Policy, providing the following data
 - a. Name and surname
 - b. E-mail address
 - c. Telephone number

The package will automatically adapt to the following available versions:

- a. Small
- b. Medium
- c. Large

Optional, additionally paid services at the customer's request (each time ordered by message via the contact form):

- a. Dedicated version of the store's graphic design
- b. Dedicated personalized functions in the store
- c. "Turnkey shop" - complete shop setup for the customer
- d. Marketing in paid channels (such as Google, Facebook, Instagram, LinkedIn, etc.)
- e. Managing the company page on Facebook
- f. Transferring the store from another Store Platform to Selesto
- g. Training in operating the store
- h. Legal support in the form of a set of documents prepared to be entered into the shop system
- i. Support in creating the Business Plan
- j. Organization of a Photo Session

After confirming the order, the Service Provider will contact the User in order to verify his data. After the Store is made available by the Administrator, the User may proceed to configure and manage the online store.

- d) SaaS** -Software as a Service - the model for the provision of Services by the Service Provider
- e) SELESTO Platform** - a virtual platform available via the Internet at: www.selesto.pl, which allows Users to use IT mechanisms and electronic services developed by the Administrator - the possibility of creating an online store by SELESTO on a separate domain, indicated by the User.
- f) Service** - providing the User with the possibility of creating and running an online store, using the templates and elements provided by the Service Provider.

- g) Personal data, Data** - Personal data is collected and processed in accordance with applicable law, including in accordance with the GDPR - i.e. Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016, known as the general regulation on data protection.

The Administrator processes personal data such as: name, surname, name of the store, telephone number, e-mail address - if the User uses the option of contacting the Administrator. It also collects and processes personal data in connection with the provision of services to the User - outside the website. In addition, the Administrator collects information on User activity on the website and, for this purpose, processes personal data such as system logs, IP address, as well as data in the form and type of the web browser used by the User. The data stored in the server logs are not associated with specific people using the Website or the System and are not used by the Administrator to identify the User.

To the extent that Users' personal data are processed in order to measure and improve the content on the website, the basis for data processing is the legitimate interest of the Administrator. It is in the interest of the Administrator to provide and improve its content, ensure its best quality and inform Users about it.

The legal basis for data processing by the Administrator may also be the User's consent, about which the User will be informed.

- h) Personal data of children** - services offered by the Administrator are directed to adults. Therefore, the Administrator does not knowingly process the data of children.
- i) Device** - means an electronic device through which the User gains access to the Platform.

2. Information gathering

- a)** The Administrator collects Personal Data from people who intend to place an order for the Service.
- b)** The Administrator may collect the following User Data: name, surname, name, telephone number, e-mail address.

- c)** These data contain information provided during the ordering process and at further stages of its implementation. When placing an order, any natural or legal person who orders the service at <https://selesto.pl> and becomes its User agrees to the processing of their Personal Data in accordance with the information provided when placing the order. Expressing the above consent by the User is a condition for further processing of Personal Data in accordance with applicable law. All data collected and further processed by the Administrator in accordance with the provisions of GDPR.
- d)** The Administrator collects and processes Data in order to:
- match the content of the website to the individual preferences of the user, first of all these files recognize his device in order to display the page according to his preferences, but this is not profiling;;
 - prepare statistics that help to learn about the preferences and behavior of users, the analysis of these statistics is anonymous and allows you to adjust the content and appearance of the website to the prevailing trends, statistics are also used to assess the popularity of the website;
 - log in to the website;;
 - render services,
 - send a newsletter,
 - maintain the User's login on each subsequent page of the website.

3. Use of information and its sharing

- a)** The Administrator undertakes to process the User's personal data based on applicable law and using the highest standards of data security.
- b)** The website obtains information about users and their behavior in the following way:
- a. Through information entered voluntarily in forms
- c)** In terms of Data that are personal data in the light of the provisions on the protection of personal data, the Website Operator is the data administrator.

- d)** The Administrator collects information provided voluntarily by the User. Providing the Data is voluntary, but the lack of consent to the processing of Personal Data for purposes related to the implementation of the order and the provision of Services may prevent the Administrator from implementing them.
- e)** The administrator may also save information about connection parameters (time stamp, IP address).
- f)** The data in the form are not made available to third parties - subject to data provided at the request of law enforcement agencies, state administration bodies, etc.
- g)** If the data in the form enables the identification of a natural person, such person has the right to access, modify and request the cessation of the processing of their data at any time. It is possible, however, that this will result in the lack of access to some functions of the website.
- h)** The User's data provided when placing the order and in the process of providing the Service may be transferred to entities that technically provide certain services - in particular, this applies to the provision of information about the User to websites that support payments or other entities with which the Administrator cooperates in this regard.
- i)** By checking the appropriate box on the Platform's website, the User agrees to the processing of Personal Data for a specific purpose. Personal data is processed:
 - a.** to the extent necessary to establish, shape the content, change, solve and correctly implement the Services provided electronically and orders placed by the User (including - online order handling, contact for order processing),
 - b.** to consider complaints submitted by the User and to terminate the contract,
 - c.** If the User agrees to receive marketing information from the Administrator, including sending commercial information to the User by electronic means - the User's personal data will be processed by the Administrator also in order to provide the User with information about the Platform, offer and promotions.

- j)** The Administrator ensures the security of Personal Data thanks to appropriate technical and organizational measures aimed at preventing unlawful processing of Data and their accidental loss, destruction and damage. Technical measures are constantly updated and adapted to the needs related to data processing. In addition, the Administrator takes special care that Personal Data is:
- a.** correct and processed lawfully,
 - b.** obtained only for specific purposes and not further processed in a manner inconsistent with these purposes,
 - c.** adequate, relevant and not redundant,
 - d.** were not kept longer than necessary,
 - e.** processed in accordance with the rights of the data subjects,
 - f.** securely stored,
 - g.** not transferred without adequate protection.

4. Providing data and entrusting processing

As a rule, the Administrator does not disclose the User's personal data to third parties or third parties, except when it has a legal basis for this, at the request of authorized entities or when it is necessary for the Administrator to provide services.

User data may be made available at the request of public authorities or other entities based on legal provisions.

The User's data may also be accessed by third parties whose services are used by the Administrator to provide his services. First of all, these are entities providing hosting services and IT services to the Administrator. In such cases, the Administrator has concluded appropriate data processing agreements with such entities, in which the entities processing data on behalf of the Administrator undertook to ensure that these data are secured against unauthorized access.

The data is made available to external entities only within the limits permitted by law, including on the basis of data processing agreements.

5. User rights

The User has the following rights:

- a. right to access your data - at the User's request, the Administrator will confirm what data he processes and provide him with a copy of the data;
- b. the right to rectify personal data - if the User's data is incorrect or incomplete, the User may request the Administrator to correct or supplement them;
- c. the right to delete personal data ("the right to be forgotten") - in certain situations, the User may request the Administrator to delete his personal data (eg if the data is no longer necessary for the Administrator);
- d. the right to limit processing - in certain situations, the User may request the Administrator to limit the processing of his data, e.g. when he questions the correctness of personal data;
- e. the right to transfer data - in certain situations, the User has the right to receive in a structured, commonly used, machine-readable format, to be transferred to another administrator (e.g. when data processing is based on the User's consent),
- f. the right to object - the User may request the cessation of the processing of personal data for reasons related to his particular situation with regard to data processing, among others, when it is not based on the legitimate interest of the Administrator. The administrator should then not process the User's data, unless he demonstrates the existence of valid, legally justified grounds for processing, overriding the interests, rights and freedoms of the User or the grounds for establishing, investigating or defending claims,
- g. the right to lodge a complaint to the President of the Personal Data Protection Office - in a situation where the User believes that the data is being processed improperly.

6. The period of data storage

The Administrator stores Users' data, as a rule, only for the time necessary to achieve the purposes for which the data was collected. After this time, the data is deleted or anonymized.

Personal data may also be stored for such a period as is required by law or, if necessary, to establish, investigate or defend claims against Users by the Administrator.

7. Cookie files

- a) The website uses cookies. The cookies used by the Administrator are safe for the User's Device. In particular, it is not possible for viruses or other unwanted software or malware to enter Users' Devices this way. These files make it possible to identify the software used by the User and adjust the Platform individually to each User.
- b) Cookie files (so-called "cookies") are IT data, in particular text files, which are stored on the Website User's end device and are intended for using the Website's pages. Files of this type usually contain the name of the website they come from, their storage time on the end device and a number.
- c) The web browser used by the User is responsible for storing and handling cookies. Most often, the browser allows cookies to be stored on the User's end device by default (e.g. on a computer, phone, tablet).
- d) The website uses two basic types of files (cookies) - session and permanent. Session files are temporary, they are stored until you leave the website (by entering another page, logging out or turning off the browser). Permanent files are stored on the User's End Device until they are deleted by the User or for the time specified in their settings.
- e) The entity that places cookies on the Website User's end device and obtains access to them is the Website operator or entities cooperating with it.
- f) Cookies are used for the following purposes:

- to match the content of the website to the individual preferences of the User, first of all these files recognize his device in order to display the page according to his preferences, but this is not profiling;
 - to prepare statistics that help to learn about Users' preferences and behaviors; the analysis of these statistics is anonymous and allows you to adjust the content and appearance of the website to the prevailing trends, the statistics are also used to assess the popularity of the website;
 - to log in to the website;
 - to maintain the User's login on each subsequent page of the website,
 - to enable the use of the Platform and its functions.
- g)** The User has the option to limit or disable the access of cookies to his Device. Restrictions on the use of cookies may affect some of the functionalities available on the Website pages.
- h)** Cookies placed on the Website User's end device may also be used by advertisers and partners cooperating with the Website operator, as well as payment operators.
- i)** The user may at any time delete cookies from his end device, using the settings of the web browser he uses: <http://jakwylaczycookie.pl/jak-wylaczyc-pliki-cookies/>. For security reasons, it is recommended to use the latest versions of web browsers.
- j)** Disabling or deleting cookies may affect the use of certain functionalities of the SELESTO Platform.

8. Managing cookies

- a)** If the User does not want to receive cookies, he may change the browser settings.

- b)** The web browser used by the User is directly responsible for the handling and storage of cookies. Most often, the web browser allows cookies to be stored on the User's end device by default.
- c)** The User may at any time delete cookies using the functions available in the web browser he uses.

9. Technical and organizational measures to protect data

The Administrator uses appropriate technical and organizational measures to ensure the level of security of the processed data against unauthorized access, deletion or disclosure.

10. Changes to the Privacy Policy

In the footer of the website, the Administrator maintains the current content of the Privacy Policy.

11. Contact

Any questions, applications and comments regarding this Privacy Policy may be sent by the User to the following address: kontakt@selesto.pl