

PRIVACY POLICY

I. GENERAL INFORMATION

- 1.1. This Privacy Policy (hereinafter referred to as the "**Policy**") sets out the rules for the processing of personal data of users of the website (hereinafter referred to as the "**Users**") operating at www.zonavolantini.com (hereinafter referred to as the "**Website**"), as well as other categories of persons indicated in the Policy by Waterythm Trading Limited with its registered office in Nicosia, Cyprus, Katalanoy, 1, Floor 1, flat 101, Aglantzia, 2121, Nicosia, Cyprus, with registration number 424415.

II. PERSONAL DATA CONTROLLER, AND PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

- 2.1. A The controller of personal data within the meaning of the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "**GDPR**") is Waterythm Trading Limited with its registered office in Nicosia, Cyprus, Katalanoy, 1, Floor 1, flat 101, Aglantzia, 2121, Nicosia, Cyprus, with registration number 424415, hereinafter referred to as the "**Company**", in the following scope:

DATA SUBJECT	PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA
User of the Website	a) necessity for the purposes resulting from the legitimate interests pursued by the Company, in particular ensuring the proper operation of the Website, the possibility of navigating the Website and using its basic functions, as well as for the establishment, exercise or defense of any legal claims pursuant to Article 6(1)(f) of the GDPR;
	b) necessity for improving the performance of the Website and collecting information on how Users use the Website, enhancing the Website, adjusting the Website's operation to the User's preferences, and creating statistics on the use of the Website pursuant to Article 6(1)(a) of the GDPR;
	c) necessity for marketing purposes, such as personalization of advertisements and content based on the User's interests, measuring the performance of advertisements and content and obtaining insight into recipients who have seen

	<p>advertisements and content pursuant to Article 6(1)(a) of the GDPR.</p>
<p>Newsletter subscribers</p>	<p>a) necessity for the purposes of informing about new products, changes, offers, updates in the scope of the Company's activities, resulting from the legitimate interests pursued by the Company under Article 6(1)(f) of the GDPR – in case of giving consent to receive commercial information via electronic means of communication to the e-mail address provided.</p>
<p>A natural person conducting a sole proprietorship who has concluded a contract with the Company or requested the Company to take actions in their case prior to the conclusion of the contract</p>	<p>a) necessity to perform the contract concluded with the Company or to take action at the request of the data subject before concluding the contract pursuant to Article 6(1)(b) of the GDPR;</p>
	<p>b) necessity to fulfill legal obligations incumbent on the Company, in particular those resulting from tax law and accounting regulations pursuant to Article 6(1)(c) of the GDPR;</p>
	<p>c) necessity for purposes resulting from legitimate interests pursued by the Company, in particular ensuring contact before concluding the contract and during the term of the contract, as well as for establishing, exercising or defending of any possible legal claims pursuant to Article 6(1)(f) of the GDPR.</p>
<p>Representative, contact person or other person on the part of the entity that concluded the contract with the Company or another person involved in the performance of the contract concluded with the Company or contacting the Company</p>	<p>a) necessity for purposes resulting from legitimate interests pursued by the Company, in particular ensuring contact with the entity being a party to the contract concluded with the Company, verifying whether the person contacting the Company is authorized to act on behalf of this entity, correct performance of the contract concluded with the Company, answering the question in connection with communication with the Company, and establishing, exercising or defending of any possible legal claims pursuant to Article 6(1)(f) of the GDPR;</p>

	b) necessity to fulfill legal obligations incumbent on the Company, in particular those resulting from tax law and accounting regulations pursuant to Article 6(1)(c) of the GDPR.
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III. CONTACT IN MATTERS RELATED TO THE PROCESSING OF PERSONAL DATA

- 3.1. In matters related to the protection of personal data, the Company can be contacted to the following address: Katalanoy, 1, Floor 1, flat 101, Aglantzia, 2121, Nicosia, Cyprus.

IV. RECIPIENTS OF PERSONAL DATA

- 4.1. Recipients of personal data may be - only in cases where it is necessary and to the extent necessary - entities cooperating with the Company in the scope of services provided to the Company and supporting the Company's current business operations, in particular entities providing IT, marketing and legal services. The recipients of personal data may also be the Partners indicated in **sec. 8.2** of the Policy.
- 4.2. Personal data may be transferred to the United States in connection with the Company's use of the services of entities providing marketing services based in the United States. In order to protect them, the Company concluded standard contractual clauses with these entities and assessed the planned transfer in terms of ensuring compliance with the law.

V. PERSONAL DATA STORAGE PERIOD

- 5.1. If data is processed on the basis of a voluntarily given consent, personal data will be stored until the consent to the processing of personal data is withdrawn for specific, explicit, and legitimate purposes. The consent to the processing of personal data may be withdrawn at any time. The consent to the processing of data may be withdrawn by contacting the Company at Katalanoy, 1, Floor 1, flat 101, Aglantzia, 2121, Nicosia, Cyprus. Withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.
- 5.2. If the processing of data is necessary to perform the contract to which you are party, or to take actions at your request before concluding the contract, your personal data will be processed for the duration of the contract, and after this period for the limitation period of possible claims resulting from generally applicable provisions of law.
- 5.3. If the processing is necessary to fulfill the legal obligation incumbent on the Company, your personal data will be processed for the period of time resulting from the generally applicable provisions of law.
- 5.4. If processing is necessary for the purposes resulting from the legitimate interests pursued by the Company or by a third party, your personal data will be processed for a period not longer than it is necessary for the purposes for which the data is processed or until you object to the processing of personal data in the scope of personal data processing for these purposes, for reasons related to your particular situation, unless the Company demonstrates compelling

legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

VI. IS THE PROVISION OF PERSONAL DATA OBLIGATORY?

- 6.1. If personal data are processed on the basis of the consent of the data subject, the provision of personal data is voluntary.
- 6.2. If personal data are processed for the purposes necessary to perform the contract to which the data subject is a party, or to take action at the request of the data subject before concluding the contract, providing personal data is voluntary, but necessary to conclude a contract with the Company.
- 6.3. If the processing of personal data is necessary to fulfill a legal obligation to which the Company is subject, the provision of personal data is a statutory requirement.
- 6.4. If personal data is processed for purposes resulting from the legitimate interests pursued by the Company or by a third party, the provision of personal data is voluntary, but necessary to achieve these purposes.

VII. RIGHTS WITH REGARD TO THE PROCESSING OF PERSONAL DATA

- 7.1. The data subjects have the right of access to their personal data, right to rectification or erasure of their personal data, right to restriction of processing of their personal data and right to personal data portability - in the scope of data processing on the basis of consent or for the purposes necessary to perform the contract and by automated means, and the right to object to processing of personal data - in the scope of data processing for purposes resulting from the legitimate interests pursued by the Company, unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subjects, or grounds for establishing, pursuing or defending claims.
- 7.2. In the case of processing personal data on the basis of the consent of the data subjects, they have the right to withdraw consent to the processing of personal data at any time, without affecting the lawfulness of the processing which was carried out on the basis of consent before its withdrawal. The consent to the processing of data may be withdrawn by contacting the Company at Katalanoy, 1, Floor 1, flat 101, Aglantzia, 2121, Nicosia, Cyprus.
- 7.3. The data subject also has the right to lodge a complaint with the supervisory authority for the protection of personal data - the President of the Personal Data Protection Office.

VIII. COOKIES

- 8.1. The Website uses cookie files (i.e. small text files sent to the User's device, identifying it in a way necessary to simplify or cancel a given operation) in order to collect information related to the use of the Website by the User.
- 8.2. Information, including personal data, obtained in connection with the use of cookies on the Website, is processed by the Company as the Website's service provider and may be processed by its Partners, the list of which is available in [Cookie Settings](#) panel (hereinafter "Partner").

8.3. The Website uses the following types of cookies due to the purpose of their use:

- a) necessary cookies - they are used to ensure the proper operation of the Website, in particular the ability to navigate the Website and use its basic functions. They are necessary for the operation of the Website and cannot be turned off, as disabling them would prevent the Website from functioning. The basis for the processing of personal data obtained in connection with the use of necessary cookies is the necessity for the purposes described above resulting from the legitimate interests pursued by the Company (Article 6(1)(f) of the GDPR);
- b) analytical cookies - they are used to improve the performance of the Website and collect information on how Users use the Website, improve the Website, adjust the Website's operation to the User's preferences and create statistics on the use of the Website. The information collected in this way may be sent to our Partners with whom we cooperate, if the User agrees. The basis for the processing of personal data obtained in connection with the use of analytical cookies is the User's consent to the processing of personal data (Article 6 (1) (a) of the GDPR);
- c) advertising cookies - they are used for marketing purposes, such as personalizing ads and content based on the User's interests, measuring the performance of ads and content, and getting insight into the audience who saw the ads and content. The information collected in this way may be sent to our Partners with whom we cooperate, if the User agrees. The basis for the processing of personal data obtained in connection with the use of advertising cookies is the User's consent to the processing of personal data (Article 6 (1) (a) of the GDPR).

8.4. Types of cookies according to the storage period in the browser:

- a) session cookies - they are stored on the User's device and remain there until the end of the browser session. The saved information is then permanently deleted from the device memory. The session cookie mechanism does not allow the collection of any personal data or any confidential information from the User's device;
- b) persistent cookies - they are stored on the User's device for the time specified in the cookie parameters or until they are deleted by the User. Ending a browser session or turning off the device does not delete them from the User's device. The persistent cookie mechanism does not allow the collection of any personal data or any confidential information from the User's device.

8.5. The types of cookies by origin:

- a) first-party cookies - set by the Website's servers.
- b) third-party cookies - set by web servers of parties other than the Website.

8.6. Cookies are used on the Website based on the User's consent expressed by selecting the appropriate option when using the Website, adjusting the cookie choices via the [Cookie Settings](#) panel or by properly configuring the User's browser settings. Expressing consent to the use of cookies on the Website is voluntary.

- 8.7. Before giving consent to the use of cookies, the User is informed about the purposes of using cookies and about the possibility of changing cookie settings at any time.
- 8.8. The User may withdraw the prior consent to the use of cookies and change the cookie settings at any time via the [Cookie Settings](#) panel, as well as delete cookies from the User's device memory.
- 8.9. In addition, the User may at any time change the settings for cookies used on the Website in the settings of the web browser. Detailed information on the possibility and methods of changing cookie settings in the most popular web browsers can be obtained at:
- a) Google Chrome <https://support.google.com/chrome/answer/95647?hl=pl>;
 - b) Firefox <https://support.mozilla.org/pl/kb/ciasteczka?esab=a&s=ciasteczka&r=0&as=s>;
 - c) Internet Explorer <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>;
 - d) Opera <http://help.opera.com/Windows/12.10/pl/cookies.html>;
 - e) Safari <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>.