

Privacy Notice for Newsletter Subscribers

In performance of our obligations arising from the 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 (General Data Protection Regulation), we provide this Privacy Notice.

I. Personal Data Controller

Edisonda P.S.A. with the registered seat in Kraków, at Dietla 52/9 street (31-039 Kraków), entered into the Register of Entrepreneurs under number KRS 0001036444.

II. Data Protection Officer

We have appointed a Data Protection Officer. The Officer can be contacted:

- a. by traditional mail to the address specified above,
- b. by electronic mail: iod@edisonda.pl

III. Purposes of processing of personal data and legal bases for processing of personal data by the Controller

No.	Purpose of processing	Legal basis	Period of processing
1.	Providing a newsletter that includes sending commercial information. We send you a newsletter based on your consent or when we have our legitimate interest to maintain positive business relationships.	Under Article 6(1)(a) of GDPR	Until withdrawal of consent by the data subject. Withdrawal of the consent does not affect lawfulness of processing performed prior to the withdrawal.
2.	For analytical and statistical purposes connected with assessment of effectiveness of marketing activities, which is a legitimate interest of the Personal Data Controller.	Under Article 6(1)(f) of GDPR	Until effective objection to processing of data for that purpose is submitted by the data subject.

IV. Voluntary provision of data, effects of failure to provide data

Providing the data connected with newsletter subscription is voluntary, but failure to provide them makes it impossible for us to send the newsletter.

V. Data recipients

The Controller can make personal data available to postal operators, state authorities authorised under the law, companies related by capital with the Controller (potentially other entities associated in Grant Thornton International, as part of pursuit of internal administrative purposes and in case of entrustment of processing of personal data where the entity acts as a subcontractor of the Controller). Additionally, data can be entrusted to, in particular, entities providing IT services, including marketing platforms, providers of other marketing services, providers of administrative support, entities providing document destruction services, entities providing advice regarding protection of personal data and other providers of the company.

VI. Transfer of personal data to a third country

Personal data can be transferred outside the European Economic Area and made available to international organisations. If the Controller uses services of providers from outside the EEA, the transfer of data is based on the adequacy decision of the European Commission, and should there be no such decision - the transfer is based on the standard contractual clauses adopted by the European Commission and prescribed in the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council. Copy of the standard contractual clauses and applied transfer security measures can be obtained from the Personal Data Controller.

VII. Catalogue of rights of data subjects.

In connection with the processes described above, you have the following rights:

- a. to access your personal data,
- b. to rectify the data,
- c. to have the data erased unless the criteria provided for in Article 17(3) of GDPR are satisfied,
- d. to restrict the processing,
- e. to object to processing,
- f. to data portability,
- g. to file a complaint with the President of the Personal Data Protection Office in the scope of processing of personal data by the Controller.

Concurrently, we inform that the preferred form of contact to exercise the above catalogue of rights is electronic mail sent to the address: iod@edisonda.pl.

VIII. Automated decision-making, including profiling.

The processing of personal data does not involve profiling or automated decision-making. We segment the group of recipients into active and inactive through monitoring of activities (message opening, clicking the attached button, etc.).