

PRIVACY POLICY OF SECURITUM SERVICES

Preliminary Information

At SECURITUM, we attach particular importance to the protection of privacy and personal data.

In this Privacy Policy of SECURITUM Services, we describe the key aspects concerning the processing of personal data of users of our Services, that is, how we handle data relating to you obtained in connection with the operation of our Services. We encourage you to read this document before using our Services.

The terms used in this Policy shall have the following meanings:

- » **Policy** – this Privacy Policy of SECURITUM Services;
- » **SECURITUM** or **we/us** – the Service Provider, namely the company responsible for the Service, acting as its publisher and operator;
- » **User** – a natural person whose personal data is processed by SECURITUM in connection with that person's use of the Service and/or SECURITUM profiles on social media platforms;
- » **GDPR** – Regulation (EU) 2016/679 of the European Parliament of the 27th of April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation);
- » **Service** – this website.

Personal Data in the Service

The controller of the personal data of Service Users is the provider of the relevant Service, namely SECURITUM.

SECURITUM Services are provided by various companies within our Group. Depending on the Service, its publisher and operator is:

- » for <https://securitum.pl/>: Securitum Szkolenia Sp. z o.o., KRS: 0001108974;
- » for <https://wydawnictwo.securitum.pl/>: Securitum Wydawnictwo Sp. z o.o., KRS: 0001044256;
- » for <https://sklep.securitum.pl/>: , KRS: 0001108974;
- » for <https://securitum.com/>: Securitum Audyty Sp. z o.o., KRS: 0001028899;

You may contact SECURITUM using the details provided in the “**Contact Us**” section.

In this part of the Policy, we describe how, as SECURITUM, we use personal data collected through the Service.

Users may make use of different functionalities of the Service. In such cases, the way in which we collect and use personal data may differ. **Whenever we ask you to provide any personal data, we will inform you in detail about the conditions under which such data will be processed.**

Users visiting the Service

We collect data of Users visiting our Service automatically, in the form of system logs and by means of technologies supporting our Service.

Information contained in system logs (e.g. IP address, details of HTTP requests) is used by us for technical purposes related to server administration. In addition, IP addresses are used to collect general, statistical demographic information, such as the region from which the User connects to the Service. Providing such data is therefore voluntary; however, failure to provide it may result in the inability to use certain elements or functionalities of the Service.

Within the Service, we use “cookies” and similar technologies, collectively referred to as Cookies. Some of them may contain information that allows us to identify the User (e.g. identifiers). In such a case, we treat information collected through Cookies as personal data.

We process personal data obtained through Cookies in order to pursue our legitimate interests, on the basis of Article 6(1)(f) of the GDPR.

Depending on the Service and on which Cookies have been accepted by the User, the above-mentioned legitimate interests for which data read from Cookies is used include:

- » ensuring the proper and secure functioning of the Service for the User and the User’s device;

- » assisting Users in effectively navigating the Service, adapting the Service to the User's individual settings, and remembering data entered by the User in connection with the use of the Service, for example the User's choice regarding the saving of Cookies;
- » performing various functions, including monitoring and analysing traffic and compiling statistics, conducting statistical analyses concerning Users visiting the Service, for example website visit statistics, which serve to identify errors, solve problems relating to the Service and its functioning, improve the effectiveness of our marketing activities and the development of our business strategy, and ensure the continued development of the Service.

The data is processed until the purposes of its collection (indicated above) have been achieved, or until an effective objection to its processing has been raised, or until Cookies are deleted from the device used by the User to connect to the Service, depending on which event occurs first.

Certain Cookie functions make it possible to combine Users' personal data and create statistics and compilations based on it, which we may later use in order to appropriately tailor the content made available to Users. In connection with the preparation of analyses and statistics, User profiling may occur, that is, the creation of a profile containing information about the User's interests or specific characteristics. At the same time, we inform you that decisions based on the profiles created will not be made in an automated manner.

More information about Cookies, including information concerning the management and deletion of Cookies, can be found in the section of the Policy called the **Cookie Policy**.

Persons Contacting Us

We process the personal data of Users contacting us (through contact forms or contact details available in the Service, as well as through SECURITUM platforms and profiles operated on social media) in order to pursue our legitimate interests, on the basis of Article 6(1)(f) of the GDPR, for the following purposes:

- » **responding to a message or inquiry sent to us** (that is, ensuring communication with the User, including replying to received messages and inquiries).
- » The data is processed for this purpose until a response to the inquiry has been provided or until an effective objection to the processing of your data has been raised, depending on which event occurs first;

- » **establishing, pursuing, or defending against claims** (that is, securing claims).

The data is processed for this purpose until the limitation period for such claims expires, as provided for by generally applicable laws;

- » **ensuring the highest quality of our services** (that is, for service quality management).

SECURITUM takes care to ensure the quality of the services provided and analyses every problem reported by Users in connection with the use of those services. Information obtained from Users may be processed in order to improve the overall quality of our services, apply corrective measures, and implement systemic solutions. For this purpose, we use anonymised reports, although the anonymisation process itself constitutes data processing. Consequently, in order to ensure the highest quality of services, we may process the User's personal data for the period necessary to anonymise the report related to quality;

- » **creating summaries, analyses, and statistics.**

In the vast majority of cases, such materials are prepared on the basis of non-personal data or anonymised data. In certain cases, personal data may be used. In such cases, we process the User's personal data until the relevant summary, analysis, or statistic has been prepared, or until an effective objection to the processing of data for this purpose has been raised, depending on which event occurs first.

Our Clients and Service Recipients

In some of our services, we make additional functionalities available to Users, for example an online store.

Detailed information concerning the processing of the User's personal data in connection with the use of additional functionalities (if such functionalities are available within the Service) can be found in the relevant terms and conditions for the provision of services:

- » for <https://wydawnictwo.securitum.pl/>: **here**;
- » for <https://sklep.securitum.pl/>: **here**.

Users of Our Social Media

SECURITUM operates its own pages on social media platforms:

- » a fan page on the Facebook.com platform.

The Facebook platform is provided by Meta Platforms Ireland Ltd (formerly: Facebook Ireland Ltd; "**Facebook**").

The purpose and scope of data collection and the further processing and use of data by Facebook, as well as rights and privacy settings, can be found in Facebook's privacy policy: <https://www.facebook.com/policy.php>.

Since, within the framework of our cooperation with Facebook, joint control- lership of personal data takes place, the User has the right to obtain a summa- ry of the arrangements made between Facebook and SECURITUM regarding such joint controllership. A summary of the key information is available here https://www.facebook.com/legal/controller_addendum.

- » a profile on the Twitter (X) platform.

The provider of the Twitter (X) platform is Twitter International Company (X International Unlimited Company) ("**Twitter**" or "**X**").

The purpose and scope of data collection and the further processing and use of data by Twitter, as well as rights and privacy settings, can be found in Twit- ter's privacy policy: <https://twitter.com/en/privacy>.

- » a profile on the LinkedIn.com.

The LinkedIn platform is provided by LinkedIn Ireland Unlimited Company ("**LinkedIn**").

The purpose and scope of data collection and the further processing and use of data by LinkedIn, as well as rights and privacy settings, can be found in LinkedIn's privacy policy: <https://pl.linkedin.com/legal/privacy-policy>.

Since, within the framework of our cooperation with LinkedIn, joint controller- ship of personal data takes place, the User has the right to obtain a summa- ry of the arrangements made between LinkedIn and SECURITUM regarding such joint controllership. A summary of the key information is available here: <https://legal.linkedin.com/pages-joint-controller-addendum>.

- » a server on the Discord platform.

The provider of the Discord platform is Discord Netherlands BV ("**Discord**").

The purpose and scope of data collection and the further processing and use of data by Discord, as well as rights and privacy settings, can be found in Discord's privacy policy: <https://discord.com/privacy>.

Within the framework of cooperation with social media platform providers, we partly obtain personal data directly from the User and partly from the User's profile on the relevant social media platform.

- » To the extent that we obtain data **directly from the User**, the provision of personal data is entirely voluntary, and failure to provide such data does not result in any negative consequences.

The User may use SECURITUM's social media profiles without providing any personal data and may remain anonymous at all times (where the User merely browses any of our profiles on those platforms without interacting with them).

- » To the extent that we obtain data from the **User's social media profile** (in connection with the User interacting with our profile on those platforms), all data included in the User's profile and marked as "Public", or data which the User has expressly made available to us through the profile by configuring privacy settings in such a way that we may access it, will be disclosed. We may also obtain anonymous statistical summaries from social media providers, prepared with consideration of the User's data.

We use the data obtained in connection with cooperation with social media providers in order to prepare analyses, statistics, and compilations that serve to improve the effectiveness of our activities, develop our business strategy, and ensure the continued development of SECURITUM. In the vast majority of cases, such statistics are prepared on the basis of non-personal or anonymised data. In certain cases, however, personal data collected through Cookies may be used. Where personal data is used for this purpose, its processing is based on the necessity of pursuing our legitimate interest in carrying out analytical and statistical activities aimed at our development, and therefore on Article 6(1)(f) of the GDPR (until the above purpose has been fulfilled or until an effective objection to the processing of the data has been raised, whichever occurs first).

Personal data disclosed by the User through their social media profile will also be processed for the purpose of exchanging information about us, our initiatives, and our activities, in pursuit of our legitimate interests, and therefore on the basis of Article 6(1)(f) of the GDPR (until an effective objection to such processing has been raised or until such data has been removed from the profile, whichever occurs first).

If you contact us through our social media profiles, we process your data for contact purposes, in accordance with the rules described in the section “**Persons Contacting Us**”.

In connection with the functioning of social media, profiling of the User as a user of particular platforms may occur, that is, the creation of a profile containing information about the User's interests or specific characteristics. Certain functions provided by social media providers make it possible to combine users' personal data (including data relating to you as a user of those platforms) and create statistics and compilations based on such data, which we may later use in order to appropriately tailor the content made available to Users. At the same time, we inform you that decisions based on the profiles created will not be made in an automated manner.

Recipients of Data

Disclosure of the User's personal data to third parties may take place only where it is absolutely necessary for the activities and purposes pursued by us, or where we are required to make such disclosure under generally applicable laws. Your data is not, and will not be, the subject of sale.

We may disclose the User's personal data:

- » to third parties providing services to us which are necessary for the purposes for which we process the User's data (for example, IT services, accounting, electronic communication, data hosting, services relating to the functioning of the Service, data analysis, email delivery services, legal services, and social media platform providers acting as joint controllers of data, for the purposes and in the manner specified in those providers' privacy policies);
- » to recipients to whom disclosure is required under applicable legal provisions or by a decision of a court or another authority (including competent administrative authorities, institutions, and other authorised entities in Poland and abroad, where required by applicable law or at their request under procedures provided for by law);
- » to other recipients, if the User gives consent to such disclosure.

As a rule, we do not transfer your data outside the European Economic Area (EEA). However, some of our partners and providers may have their registered offices or data centres in other countries, including countries outside the European Economic Area (EEA), for example the United Kingdom.

If necessary for the purposes of data processing indicated above, the User's personal data will be transferred to countries that ensure the same or an adequate level of personal data protection as required under the laws applicable in Poland. If it is necessary to transfer data to a country that does not provide such protection, we will ensure that this takes place on the basis of a valid legal ground and with the safeguards required by law in order to protect the User and the User's personal data.

Rights of Data Subjects

In connection with our processing of personal data, you, as a User, are entitled to the following rights:

- » the right to **request access to the content of your personal data**, as well as to obtain a copy thereof;
- » the right to request the **rectification of your personal data** if you believe that the data is inaccurate or incomplete;
- » the right to request the **erasure of your personal data** if:
 - › the data is no longer necessary for the purposes for which it was collected by us;
 - › consent to the processing of the data has been withdrawn and we have no other legal basis for processing such personal data;
 - › an objection to the processing of personal data has been raised and there are no overriding legitimate grounds for processing on our part despite such objection, or an objection has been raised to the processing of personal data for direct marketing purposes;
 - › the data has been processed unlawfully;
 - › the data must be erased in order to comply with a legal obligation, or the data was collected in connection with the provision of information society services offered to a child.

The right to erasure does not apply to data processed on the basis of applicable legal provisions or to data processed for the purpose of establishing, defending, or pursuing claims.

- » the right to request **restriction of the processing of personal data** if:
 - › you notice that the data is inaccurate. As a User, you may request restriction of the processing of your data for the period allowing us to verify the accuracy of such data;
 - › the data is processed unlawfully, but you do not wish for it to be erased by us;
 - › we no longer need the data, but you may require it for the establishment, pursuit, or defence of claims;
 - › you object to the processing of the data, until it is determined whether the legitimate grounds existing on our part override the grounds for your objection.
- » the right to **data portability** with respect to data that we have received directly from you, if the processing is carried out by automated means and on the basis of your consent or a contract concluded with you;
- » the right to **object to the processing of personal data** if the processing is based on our legitimate interest and the objection is justified by your particular situation, or concerns the processing of personal data for direct marketing purposes.

You also have the right to **withdraw any consent** on the basis of which your personal data is processed, as well as consent to the use of your email address or telephone number for marketing purposes. Withdrawing consent does not affect the lawfulness of actions carried out before such withdrawal.

To exercise the above rights, please contact us using the details provided in the section "**Contact Us**".

You also have the right to **lodge a complaint** if you believe that the processing of your data violates the provisions of the GDPR. The complaint should be submitted to the supervisory authority, which since 25 May 2018 has been the President of the Personal Data Protection Office.

Cookie Policy

What Are Cookies?

Within the Service, we use "cookies" technology and similar technologies, hereinafter collectively referred to as Cookies.

- » “cookies” technology – small text files that may contain various information about the User, including the computer’s IP address and a unique device identifier.

More information about cookies can be found at www.allaboutcookies.org or <https://wszystkoociasteczkach.pl/>;

- » Web/Local Storage – a dedicated part of the browser’s memory used to store data saved by a website. It may only be accessed by the website operating within the same domain from which the data was saved. Web/Local Storage allows information similar to cookies to be stored, particularly in new environments or in environments where cookie technology does not function properly or cannot function.

Cookies are stored in the memory of your device – they are not stored on our servers. Our Service merely reads the contents of those files, gaining access to them during your visit.

Within SECURITUM services, we use various types of Cookies. In this part of the Policy, we describe the Cookies that the User may encounter in our services. **The User may at any time check which Cookies are used within the visited Service** by examining the contents of the memory of the device being used or by using the settings of their browser.

Use of Cookies Within the Service

Cookies may be either “session” cookies (deleted after the browser is closed) or “persistent” cookies (remaining in your device’s memory for a longer period of time).

Within the Service, we use the following Cookies:

- » **necessary**, mandatory for the proper functioning of the Service and the functionalities offered within it.

These Cookies are necessary to enable you to navigate the Service and use it, for example, to access protected areas, and to ensure security for you and the device from which you connect to the Service. Some services cannot be provided without these files.

Necessary Cookies are always session cookies;

- » **performance and analytical**.

Such Cookies make it possible to adapt the services and content presented to your individual needs and preferences. They collect information concerning how you use the Service and are used by us to analyse traffic on the website

and determine what we can do to make the Service even more convenient for you to use. These Cookies may help us identify particularly popular areas of the Service and enable us to adapt it to your expectations. On the basis of the information obtained from these Cookies, aggregated and anonymised reports may be prepared.

Performance and analytical Cookies are persistent in nature. Cookies used for this purpose remain on your device for a specified period determined in their parameters, or until they are manually deleted by you. Local Storage used for this purpose is stored by the browser until manually deleted by you. More information about deleting Cookies can be found in the section "**Managing Cookies**".

The Cookies we use do not enable targeted advertising to be sent or remember which areas you browse across the Internet.

To a certain extent, Cookies may allow us to process personal data relating to you. More information about the processing of your personal data, including in connection with Cookie technology, can be found in the section "**Users Visiting the Service**".

Managing Cookies

Cookies are used almost exclusively with your consent. Consent is not required for Cookies that are absolutely necessary to use the Service or other functionalities, or to ensure information security. Performance and analytical Cookies require your consent.

You may refuse consent to the use of Cookies by selecting the appropriate settings in your web browser. Please note, however, that this may prevent full use of the Service.

You may access Cookies by analysing the contents of the memory of the device you use to connect to our Service. For this purpose, please select the appropriate settings in the browser you use to connect to our Service.

You may also independently delete or disable Cookies stored on your device. In some cases, blocking Cookies may reduce the functionality of certain websites or, depending on the changes selected in your browser settings, make access to them impossible.

Contact Us

If you have any questions regarding the processing of your data by SECURITUM or this Policy, please contact us:

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The Policy is subject to periodic review and may be updated, supplemented, or amended at any time without prior notice to Users. Any changes are made by publishing an updated consolidated version of the Policy on the Service. The changes are made by publishing an updated consolidated text of the Policy on the Service.

Last updated: August 2025.