



Privacy policy

§1

General provisions

1. The presented Policy determines the principles of obtaining and availing of information by Akademeia High School sp.z o.o., including personal data of the users of the Internet Portal at www.akademeia.edu.pl.
2. The Policy is an integral part of the Rules and regulations governing the provision of electronic services, at www.akademeia.edu.pl (further on referred to as the "Rules and regulations").
3. The definitions used in the Rules and regulations apply to the Policy, unless specific expressions or phrases have been defined explicitly in the Policy otherwise.

§2

Information on personal data administrator

Akademeia High School sp.z o.o. with its registered office in Warsaw at ul. St. Urszula Led6chowska 2, 02-972 Warsaw, entered in the Register of Entrepreneurs run by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, under numbers: KRS 0000638796, REGON 365509117, NIP 7010618739, (further on referred to as: "Akademeia"), is the administrator of your personal data within the meaning of the Regulation of the European Parliament and of the Council (EU) 2016 / 679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (further on referred to as "GDPR").

§3

Contact details of data administrator

You can contact us at any time at the address indicated in § 2 of the Policy, by e-mail at office@akademeia.edu.pl or by phone at +48 22 299 87 87.

§4

Objectives and legal basis of personal data processing

Your personal data, which we have acquired in connection with the Provision of electronic services, is processed on the basis of:

- 1) Article 6 sect. 1 lit. b, GDPR - in the aim of concluding or executing the Agreement between us (for the provision of electronic services) or other agreements;
- 2) Article 6 sect. 1 lit. c, GDPR - in the aim of fulfilling our legal obligations, such as, for instance, provision of the security of services or handling complaints;
- 3) Article 6 sect. 1 lit. f, GDPR - to meet the objectives arising from our legitimate interests or from legitimate interests of our partners, such as, for example:
 - a) provision of reliable service and high quality of services rendered;
 - b) fraud prevention;
 - c) direct marketing;
 - d) internal administrative objectives, pursued by corporate group;
 - e) provision of network and information security;
 - f) provision of the security of services provided or brought about by ICT networks and systems;
 - g) pursuing claims arising from the Agreement between us (for the Provision of electronic services) or other agreements;
 - h) analysis of data, for instance, to enhance the provided services.
- 4) Article 6 sect. 1 lit. a, GDPR - for other purposes, depending on your approval.

§5

The scope and method of processing information, including personal data

1. While you use our Internet Portal, we acquire information sent out quasi automatically by web browsers. This information is needed to ensure proper functioning of the Internet portal and to enable you to use it. In particular it is needed for the following purposes: for registering an account or logging in to it and operating it; for making improvements in the Internet Portal; for our compliance with security and legal requirements; for compiling statistics or performing analytical tests (which we do using Google Analytics and Facebook Pixel). This information may contain data such as: the device's IP address, its type, unique identifier, name of the operating system, browser settings, date and time of sent queries, and it may also provide an account of your activity on the Internet Portal. Which



information exactly we obtain depends on a given type of device you use and on the software settings you have selected.

2. During the operation of web services, other entities that are vendors of Internet tools, including Google or Facebook, the plugins of which have been placed on our Internet Portal, may also come in possession of the information sent quasi automatically by web browsers. This information may contain data such as: the device's IP address, its type, unique identifier, name of the operating system, browser settings, date and time of sent queries, and it may also provide an account of your activity on the Internet Portal. Which information exactly is obtained depends on a given type of device you use and on the software settings you have selected. Every vendor defines the rules and objectives of the information obtained on their own websites, for example in the case of Google it is provided at <https://policies.google.com/privacy?hl=pl>.
3. When you visit our Internet portal, we use files with information called cookies. Our Internet portal sends these files to web browsers, and the browsers subsequently store them on the devices you use (computer, smartphone, smartwatch) or gain access to information already stored. These types of files consist of sequences of characters that are encoded pieces of information about the activity detected on our sites. They are availed of to facilitate the use of the Internet Portal. In particular, for preserving Internet session continuity or for remembering settings such as site layout or restrictions imposed on surveys or advertisements displayed to you. And they also allow us to record visit statistics and to better understand the way the Internet Portal works, which lets us improve it on a continuous basis. We can also use cookies for marketing purposes.
4. The devices you use may also store cookie files of other entities that areservice providers, the plugins of which have been placed on our Internet Portal, in particular, Facebook (facebook.com and instagram.com) - on which Akademeia has its profile accounts. This allows you to use integrated functionalities, which includes the possibility of switching between Facebook or Instagram and your profile account to view the content presented on your Akademeia account. Facebook sets out the rules for its use of cookies on its own websites, including <https://www.facebook.com/privacy/explanation> and <https://help.instagram.com/1896641480634370?ref=ig>.
5. You may specify the conditions for storage or access to information contained in cookies at any time using the browser settings or the settings of a given device you use. In this way,



you may consent to the storage and access of cookies or alternatively, you may withdraw such consent, blocking the acceptance of cookies. You can also delete cookies generated on our Internet portal, as well as from vendors, the plugins of which have been placed on our Internet Portal or from social network sites. However, please note, that complete disabling of cookies from being placed on your device may affect your ability to use our Internet portal.

6. Using, for instance, Internet Explorer browser, changes in the settings of cookies (enabling cookies) can be made by selecting "Tools | Internet options | Privacy | Advanced | Block cookies." You can also delete cookies from our Internet portal by selecting "Tools | Internet options | General | Delete cookies.
7. We use Google AdWords, Google Analytics and Facebook Pixel remarketing to advertise our products online. We reserve the right to use any of the methods that are provided by the above-mentioned tools to reach recipients including: recipients sharing similar interests, non-standard recipients sharing similar interests or recipients on the market of similar recipients. We use, both, our own cookies and cookies of external companies to inform, optimise and display ads based on visitor history of the Internet portal. This can also be done by entities, the plugins of which have been placed on our Internet Portal. Google and other vendors display our ads on the Internet. You can change the settings of displayed information for displaying ads at any time and customize ads on the Google Display Network using your ad settings. You can find the relevant instructions at <https://support.google.com/ads/answer/2662856?co=GENIE.Platform%3DAndroid&hl=p>. You can also block Google Analytics completely by installing an add-on for your browser. The relevant instructions are to be found at <https://support.google.com/analytics/answer/181881?hl=pl>. In the case of Facebook, if you do not wish the information collected on your activity to be used to display personalised ads, you can object to this in the Ad settings. You can find the relevant instructions at <https://www.facebook.com/help/247395082112892?helpref=related>.
8. Any time we contact you, or when you contact us, predominantly when you take interest in our offer, or when business partners initiate contact, by asking us questions in order to obtain support or order services, we gather information for the purposes of carrying out your requests and to communicate with you. The scope of data that is gathered depends on a given purpose of such contact and on means of communication chosen.



9. If you provide us with certain information, including personal data, by entering it in the forms available on our Internet Portal, as you avail of the Services we provide, for example: Registration service for an open house day or for some other open house event either at the School or the Institution, Registration service for the Summer School, Recruitment application service or Scholarship application service, Newsletter service, as well as when you avail of one of our question forms - then, in the process, we also collect information on a given date and time of sent queries and the device's IP address from which such application was sent, for instance, in order to specify who and when transmitted us your personal data.
10. If you decide to use the form facilitating application for an open house day or some other open house event at the School or the Institution, you provide us on voluntary basis with your personal data, such as your name and surname, your child name and surname, your telephone number and email address, information about the current school and class your child attends as well as the year your child applies for, i.e. the information, which is a prerequisite for accepting your application for participation in an open house day. We also let you provide us with information stating how you learned about the School.
11. If you decide to use the Summer School application form, you provide us on voluntary basis with personal data such as your name and surname, your child name and surname, your telephone number and e-mail address, information for which course you would like to enroll your child and whether you are interested in accommodating a child for the duration of a given summer course. We also let you provide us with information stating how you learned about the School.
12. Detailed information on the processing of personal data used for registering participation in the recruitment process for the School or the Institution can be found in the Recruitment Privacy Policy at www.akademeia.edu.pl.
13. Detailed information on the processing of personal data used for applying for the scholarship can be found in the Scholarship Recruitment Privacy Policy at www.akademeia.edu.pl.
14. If you have subscribed to the Newsletter or you have provided us with personal information, for the purpose of receiving commercial information electronically, such as: your telephone number or e-mail address, we can use it for marketing purposes and



provide you with information about our services. You can opt out of receiving promotional content from us at any time, and you are free to decide whether to accept or not commercial information using a given means of communication.

15. To cater for instances, when payments for services rendered are made by an individual other than the one with whom the agreement has been concluded or else when payment is remitted from a bank account that belongs to such individual, we keep information about realised payments and record name and surname or company name of the payer, bank account number and address of bank account holder.

§6

Information on automated decision making, including profiling

1. We may use personal data to evaluate some of your personal preferences or interests. This type of monitoring and analysis of the way you use our Services also allows us to better tailor them to your needs. The tools we use, inform us, if you have visited our Internet portal several times. We automatically monitor, what kind of content you took interest in, and so, we can then display ads that match your individual preferences.
2. If you come to believe that a decision influencing you in some way was either wrong or incorrect, you have the right to challenge it.
3. If you do not wish us to approach you with tailor-made offers or advertisements featuring the services we offer, you have the right to object at any time to the profiling or processing of your personal data for marketing purposes.

§7

Information on the recipients of the personal data

1. We make your personal data available exclusively in order to ensure that services we provide you with are provided properly, within the limits of the generally applicable law, transmitting it to entities guaranteeing the security of personal data processing.
2. We may share your personal data with:
 - 1) entities processing personal data on our behalf, and in particular, with:
 - a) our subcontractors, including teachers and non-pedagogical staff;
 - b) entities providing services or providing us with ICT system;
 - c) entities conducting postal or courier activities that are not postal operators;
 - d) advertising agencies;
 - e) entities providing us with consultancy services, including legal services.



- 2) other personal data administrators acting on their own behalf, and in particular, with:
 - a) postal operators;
 - b) banks and payment institutions;
 - c) our partners, i.e. entities being part of corporate group.
3. If required to do so by the law, your personal data may be disclosed to entities authorised under the law, including courts of law and prosecutors.
4. We care about protecting your privacy and never sell personal data.

§8

Information on the possibility of transferring data to international organisations and countries outside of the European Economic Area

We do not transfer your personal data to international organisations or countries outside of the European Economic Area.

§9

The period of personal data storage and the criteria for determining this period of time

Your personal data will be processed by us during the term of validity of agreements signed by and between us. Then, after any such agreements are expired and the scope is restricted to data, which is necessary to fulfill our legal obligations, it will be processed within time period indicated in the generally applicable provisions of law or in accordance with the criteria set out therein. During that timeframe, your personal data will be processed for the purposes of pursuing our legitimate interests and the legitimate interests of our partners, depending on your approval. This will also be the case, when there are significant, legitimate grounds for data processing that override your interests, rights and freedoms, or when there are grounds for establishing, pursuing or defending relevant claims. If we process your personal data conditional on your consent, we will do so no longer than past a given date on which you withdraw your consent.

For instance, we will process your personal data which we came to control for the purpose of processing your application for an open house day at the School or the Institution, within three months' time from the day on which the open house day took place.

§ 10 Rights

1. Our processing of your personal data, gives rise to your rights which we present below. If you wish to exercise any of these rights, please contact us in a form that may be convenient for you.
2. You have the right to:
 - 1) confirmation of the fact of our processing of your personal data and to access your personal data;
 - 2) obtain a copy of your personal data processed by us;
 - 3) rectify incorrect data or supplement incomplete data.
3. In situations outlined in the personal data protection law, and to the extent indicated therein, we will also exercise your rights to:
 - a. delete your personal data;
 - a. restrict the processing of your personal data;
 - b. transfer your personal data;
 - c. object to the processing of your personal data.
4. If the processing of personal data is conditional on your expressed consent, you may withdraw your consent at any time.
5. We make our reply usually within one month from the date of your request to exercise a right or rights of your choice. At the same time, we will inform you whether due to a complex nature of your request or number of requests, we will be forced to extend the stated time limit by a maximum of two following months.
6. Each time you submit a request to exercise any of your rights, we ask you to provide personal data that lets you to be identified so as not to disclose any information relating to you to unauthorised persons.

§ 11

Right to file a complaint to supervisory authority

We make every effort to ensure that the processing of your personal data is carried out in accordance with the law. However, if you believe that we have committed a violation in this respect, you have the right to file a complaint to supervisory authority to handle such issue, i.e. the President of the Office for Personal Data Protection.



§ 12

Changes to the Privacy Policy

1. This Privacy Policy has been in force since January 1, 2020.
2. The privacy policy may be updated periodically. Its current version is always available on our website at www.akademeia.edu.pl.