PRIVACY POLICY AND COOKIES POLICY OF THE CHMURI.NET WEBSITE

1. General Information

This Privacy Policy defines the rules of processing and protecting personal data as well as using cookies on the website functioning at the URL: https://chmuri.net (hereinafter referred to as the "Website").

The controller of personal data of Website Users (within the meaning of Art. 4 point 7 GDPR) is:
FUXI SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Wrocław,
ul. Azaliowa 22, 51-252 Wrocław, Poland,
entered into the Register of Entrepreneurs of the National Court Register (KRS) (hereinafter referred to as the "Controller" or "Operator").

In all matters related to the processing of personal data, you can contact the Controller via e-mail at: info@chmuri.net.

The Controller processes personal data in accordance with 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 (General Data Protection Regulation, hereinafter referred to as "GDPR"), as well as national provisions on personal data protection.

2. Purposes and Legal Bases of Data Processing

Website Users' personal data is processed for the following purposes, based on the relevant provisions of the GDPR:

- **Provision of electronic services and order fulfillment:** Processing is necessary for the performance of a contract to which the User is a party or to take steps at the request of the User prior to entering into a contract (Art. 6 par. 1 lit. b GDPR).

- **Handling inquiries and commercial contact:** Processing of data voluntarily entered in contact forms to handle a service request or answer an inquiry (Art. 6 par. 1 lit. b or lit. f GDPR – the Controller's legitimate interest).
- **Pursuit and defense of claims:** Processing is necessary for the purposes of the legitimate interest of the Controller, consisting in securing and pursuing financial claims and defending against them (Art. 6 par. 1 lit. f GDPR).
- **Fulfillment of legal obligations:** Processing to fulfill accounting, tax, and bookkeeping obligations imposed on the Controller by separate legal provisions (Art. 6 par. 1 lit. c GDPR).
- **Direct marketing:** Processing for the purpose of promoting the Controller's own services and conducting statistical analyses of website traffic (Art. 6 par. 1 lit. f GDPR).

3. Data Protection Methods Applied by the Controller

- **Encryption of transmission (SSL):** Login areas and personal data inputs are protected by an SSL certificate. Personal data and login details are encrypted on the user's computer and can only be read on the destination server.
- **Database encryption:** Personal data stored in the database is encrypted in such a way that only the Operator holding the key can read it, which protects the data in the event of a server security breach.
- **Password hashing:** User passwords are stored in hashed form using secure, one-way cryptographic algorithms, making it impossible to decrypt them.
- **Internal procedures:** The Operator periodically changes administrative passwords and regularly performs backups to ensure business continuity and protect against data loss.
- **Software updates:** The Controller ensures regular updates of information systems and software components used for processing personal data.

4. Data Recipients and International Transfers

Users' personal data may be transferred to external entities only when it is necessary to achieve the purposes specified in Section 2. These groups of recipients include:

- electronic payment operators,
- providers of IT, hosting, and information systems services,
- authorized employees and contractors of the Controller, managing the operation of the Website.

The Controller declares that personal data is not sold or unlawfully shared with third parties for commercial purposes.

Transfers outside the EEA: Due to the use of analytical and marketing tools from third parties (e.g. Google Analytics), anonymized data (in the form of cookie identifiers) may be transferred to entities based in the USA. This transfer takes place based on the European Commission's decision stating an adequate level of protection (EU-US Data Privacy Framework) or on the basis of Standard Contractual Clauses, ensuring an appropriate level of data security.

5. Personal Data Retention Period

Personal data processed for the purpose of entering into and performing a contract will be stored for the period necessary to perform the contract, and then until the expiry of the limitation periods for claims resulting from this contract and the periods resulting from legal provisions (e.g. tax ordinance – 5 years from the end of the tax year).

Data processed based on a legitimate interest (e.g. direct marketing) is processed until the User objects, but no longer than for a period of 3 years from the User's last activity.

6. User Rights

According to the GDPR, every User has the right to:

- Access their data and receive a copy of it.
- Rectify (correct) their data if it is incorrect or incomplete.
- Erase data ("the right to be forgotten"), in situations specified in Art. 17 GDPR.
- Restrict data processing in the cases indicated in Art. 18 GDPR.
- Data portability to another controller (in a structured, commonly used format).
- Object to data processing based on the Controller's legitimate interest (including profiling), unless there are valid legally justified grounds for processing that override the interests of the User, or the processing is necessary to establish, pursue, or defend claims.
- Lodge a complaint with the supervisory authority – President of the Personal Data Protection Office (Stawki 2 St., 00-193 Warsaw, Poland), if the User considers that the processing of their data violates the GDPR.

Providing personal data is fully voluntary, however, refusal to provide it may prevent the use of certain Website features or the provision of ordered services.

7. Information in Forms and System Logs

The Website collects information voluntarily provided by the User in forms.

The Website automatically saves the technical parameters of the connection (timestamp, IP address, browser information). This data is used solely for technical purposes related to server administration and website optimization.

In justified technical cases (e.g. facilitating the linking of data in the form with the User's e-mail address), the e-mail address may appear inside the URL of the page containing the form.

8. Cookies and Marketing Techniques

The Website uses cookies, which are IT data (text files) saved on the User's terminal device.

Cookies are used to:

- Maintain the User's session after logging in, so that they do not have to re-enter their username and password on each subpage.
- Conduct statistical analyses and study Website traffic using Google Analytics (Google Inc./Google Ireland Limited). Data transferred to Google is anonymized. The User can manage Google advertising preferences using a dedicated tool: https://www.google.com/ads/preferences/.

Two types of cookies are used on the Website:

- **Session cookies:** temporary files, deleted after logging out, leaving the website, or closing the browser.
- **Persistent cookies:** stored on the device for the time specified in their parameters or until deleted by the User.

The Website also allows the use of third-party cookies by cooperating entities, such as Google, Meta Platforms (Facebook), and X Corp. (Twitter) for analytical and social media integration purposes.

Managing cookies: Web browsers allow the storage of cookies by default. The User can change these settings at any time, block automatic cookies handling, or delete them using

their browser options (Edge, Chrome, Safari, Firefox, Opera, Android, iOS, etc.). Restricting the use of cookies may, however, negatively affect some features of the Website.