

PRIVACY AND COOKIES POLICY

§1 GENERAL PROVISIONS

1. This Privacy Policy applies to the processing and protection of personal data processed by ZAMEK Culture Center, with registered office at Poznań, Św. Marcin 80/82, 61-809 Poznań, hereinafter referred to as “ZAMEK Culture Center”, inclusive of personal data collected from users visiting www.ckzamek.pl website and its subpages.
2. The primary goal of ZAMEK Culture Center is to ensure security of personal data to a standard stipulated in 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, hereinafter as GDPR).
3. ZAMEK Culture Center takes the necessary measures to ensure that personal data are:
 - a. processed lawfully, fairly and in a transparent manner relative to the data subject (“lawfulness, fairness and transparency”),
 - b. collected for specific, explicit and legitimate purposes and not processed further in a manner incompatible with such purposes (“purpose limitation”),
 - c. adequate, relevant and limited to what is necessary for the purposes for which they are processed (“data minimization”),
 - d. accurate and updated as necessary; every reasonable step must be taken to ensure that personal data that are inaccurate given the purposes for which they are processed are promptly erased or rectified (“accuracy”),
 - e. kept in a form that permits identification of data subjects for no longer than necessary for the purposes for which the data are processed (“storage limitation”),
 - f. processed in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures (“integrity and confidentiality”).

§2 PERSONAL DATA PROCESSING

I.

1. ZAMEK Culture Center, with registered office in Poznań, Św. Marcin 80/82 Street, 61-809 Poznań is the Controller of your personal data.
2. With respect to personal data processing, you may contact the Controller’s designated Data Protection Officer at iod@ckzamek.pl or in writing at the Controller’s address.
3. Your personal data will be processed for the following purposes:
 - a. to conclude and perform a contract, inclusive of ensuring adequate quality of services, whereby said data is processed under an agreement with the party in question (Article 6(1)(b) GDPR); provision of personal data is voluntary but

- necessary to conclude the agreement, which may not be concluded if personal data are not provided,
- b. in order to comply with the Controller's legal obligations, including the issuance and storage of invoices, in line with the obligations resting with the Controller (Article 6(1)(c) GDPR); provision of personal data is required under applicable law,
 - c. to establish and pursue claims, in line with the provisions pertaining to Controller's legitimate interest, (Article 6(1)(f) GDPR),
 - d. sending newsletters, under obtained consent (Article 6(1)(a) GDPR); provision of personal data is voluntary but necessary to use the service,
 - e. booking tickets for events organized by the Controller, as part of actions undertaken to perform the agreement (Article 6(1)(b) GDPR); provision of personal data is voluntary but necessary to conclude the agreement, which may not be concluded if personal data are not provided,
 - f. sending invitations to events organized by ZAMEK Culture Center, in line with legitimate interest, which includes disseminating information about cultural events organized by the Controller, (Article 6(1)(f) GDPR); provision of personal data is voluntary but necessary to use the service.
4. In the case of processing of personal data by the Controller in e-mail or traditional mail correspondence that is not related to the services provided to the sender or to any other agreement concluded with the sender, personal data contained in such correspondence is processed solely for the purpose of communication and settlement of the matter which such correspondence concerns, in line with the provisions pertaining to Controller's legitimate interest (Article 6(1)(f) GDPR), which includes correspondence relating to the Controller's business activities. Correspondence is stored in a manner which ensures the security of the personal data contained therein.
 5. Your personal data will be transferred to processors which process data on behalf of the Controller, participate in the performance of the Controller's activities, including but not limited to entities which operate IT systems, entities which provide hosting services or IT systems enabling dissemination of newsletters (in the case of the newsletter service). In addition, your data will be made available to other Controllers, including but not limited to entities which operate postal or courier services.
 6. As a rule, your personal data will not be transferred to any third country. In the event of transfer of personal data to a third country (e.g. when using Google services), such transfer will be governed under the decision of the European Commission regarding the approved the EU-U.S. Data Privacy Framework, available at <https://www.dataprivacyframework.gov/s/> or standard contractual clauses approved by the European Commission. For more information see <https://policies.google.com/privacy/frameworks>.
 7. Your personal data will be processed for the duration of the agreement concluded with the party concerned, as well as after its termination to pursue claims in connection with the performance of the agreement, until the expiry of the statute of limitations on

claims arising from said agreement, to comply with legal obligations (in particular tax and accounting obligations), to prevent fraud and abuse, as well as for statistical and archiving purposes. Personal data processed in connection with the performance of legal obligations resting with the Controller will be kept for the period of time specified in applicable law.

8. Your personal data will be stored for direct marketing purposes (to the extent which does not require your consent) for the duration of the agreement or to the moment when the party files an objection, whichever occurs first, unless there are valid, legitimate grounds for processing that overrides your interests, rights and freedoms or grounds for the pursuit of or defence against claims.
9. Personal data processed under your consent shall be processed until such consent is withdrawn or until the data is no longer used by the Controller.
10. You have the right to:
 - a. access your data (Article 15 GDPR),
 - b. rectify your data (Article 16 GDPR),
 - c. have your data erased (Article 17 GDPR),
 - d. restrict data processing (Article 18 GDPR),
 - e. data portability (Article 20 GDPR),
 - f. object to data processing (Article 21 GDPR),
 - g. in the case of data being processed under consent, the right to withdraw consent, whereby the withdrawal of consent does not affect the activities performed prior to such withdrawal.
11. You have the right to file a complaint in connection with your personal data being processed by the Controller to the regulatory authority, i.e. the President of the Office for Personal Data Protection.
12. Your personal data will not be used for automated decision-making or profiling.

II.

If the data processed is the data of employees of a contractor of ZAMEK Culture Centre, provided by such contractor for the purposes of ongoing contract management, in connection with the legal relationship between the parties or with the performance of the contract, please be advised that:

1. ZAMEK Culture Center, with registered office in Poznań, Św. Marcin 80/82 Street, 61-809 Poznań is the Controller of your personal data.
2. With respect to personal data processing, you may contact the Controller's designated Data Protection Officer at iod@ckzamek.pl or in writing at the Controller's address.
3. The processing of your personal data is necessary for the following purposes:
 - a. Performance of the contract concluded with your employer/principal, in line with Article 6(1)(b) GDPR,
 - b. realization of the Controller's legitimate interests, i.e. defence against and pursuit of claims (Article 6(1)(f) GDPR).

4. In the case of processing of personal data by the Controller in e-mail or traditional mail correspondence that is not related to the services provided to the sender or to any other agreement concluded with the sender, personal data contained in this correspondence is processed solely for the purpose of communication and settlement of the matter which such correspondence concerns, in line with the provisions pertaining to Controller's legitimate interest, (Article 6(1)(f) GDPR), which includes correspondence relating to the Controller's business activities. Correspondence is stored in a manner which ensures the security of the personal data contained therein.
5. Your personal data will be transferred to processors which process data on behalf of the Controller, participate in the performance of the Controller's activities, including but not limited to entities which operate IT systems or entities which provide hosting services. In addition, your data will be made available to other Controllers, including but not limited to entities which operate postal or courier services.
6. As a rule, your personal data will not be transferred to any third country. In the event of transfer of personal data to a third country (e.g. when using Google services), such transfer will be governed under the decision of the European Commission regarding the approved the EU-U.S. Data Privacy Framework, available at <https://www.dataprivacyframework.gov/s/> or standard contractual clauses approved by the European Commission. For more information see <https://policies.google.com/privacy/frameworks>.
7. Your personal data will be processed until the expiry of the statute of limitations on claims arising from the contract in question.
8. The Controller collects your personal data from your employer/contractor or directly from you.
9. In particular, the Controller may process such categories of personal data as: your name and surname, correspondence address, telephone number, information about your place of employment.
10. You have the right to access your data, rectify your data, have your data erased, and restrict data processing.
11. You have the right to file a complaint in connection with your personal data being processed by the Controller to the regulatory authority, i.e. the President of the Office for Personal Data Protection.
12. Provision of your personal data is voluntary, but it is necessary for the performance of the contract between your employer/principal and the Controller.
13. Your personal data will not be used for automated decision-making or profiling.

§3 EVENTS ORGANIZED AT ZAMEK CULTURE CENTER

ZAMEK Culture Center in Poznań also processes personal data of participants of events, competitions, and tenders held by ZAMEK Culture Center. Information on personal data processing is included in the respective terms and conditions, forms and notifications published in connection with particular events, competitions, or tenders. ZAMEK Culture

Center processes the data provided in accordance with the principles 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.

§4 NOTICE FOR USERS OF SOCIAL MEDIA USERS

1. ZAMEK Culture Center, with registered office in Poznań, Św. Marcin 80/82 Street, 61-809 Poznań is the Controller of your personal data.
2. With respect to personal data processing, you may contact the Controller's designated Data Protection Officer at iod@ckzamek.pl or in writing at the Controller's address.
3. Your personal data will be processed for the purpose of communication and promotion on the Controller's fanpages and channels on Facebook, Instagram, YouTube, in particular to respond to the reactions, comments and private messages, as well as for statistical and advertising purposes by means of advertising tools available in the aforementioned social media platforms.
4. Such data is processed in line with the Controller's legitimate interest, which is to ensure the continuity of business communication, publicize and promote own products, maintain brand reputation, as well as search for employees or contractors. Marketing information may also be provided to you following your consent. In such a case, your consent may be withdrawn at any time by contacting the Controller by email or in writing. The withdrawal of consent does not affect the compliance of data processing prior to such withdrawal.
5. Recipients of your personal data may only include entities entitled to receive such data in accordance with applicable law. In addition, your data is made available to Meta Platforms Ireland Limited (see detailed information below). Furthermore, your data may be shared with the providers of the TikTok or YouTube platform.
6. Your personal data will be kept until objection is received or the purposes of the processing cease.
7. You have the right to request access to your personal data, as well as to have them rectified (corrected). You also have the right to request erasure or restriction of processing, as well as to object to processing, but this right only applies if further processing is not necessary for the Controller to comply with a legal obligation and there are no other overriding legal grounds for processing.
8. You have the right to file a complaint in connection with your personal data being processed by the Controller to the regulatory authority, i.e. the President of the Office for Personal Data Protection (<https://uodo.gov.pl/>).
9. Provision of data is voluntary and takes place through the use of the Controller's Fanpage.
10. As a rule, your personal data will not be transferred to any third country. In the event of transfer of personal data to a third country (e.g. when using Meta services), such transfer will be governed under the decision of the European Commission regarding

the approved the EU-U.S. Data Privacy Framework, available at <https://www.dataprivacyframework.gov/s/> or standard contractual clauses approved by the European Commission. For more information see https://www.facebook.com/privacy/policy/entry_point=data_policy_redirect&entry=0.

Notice on joint control of data with Meta Platforms Ireland Limited

1. The Controller and Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) are joint Controllers of your data, in accordance with Article 26 GDPR, whereby such data is processed for statistical and advertising purposes.
2. Joint control of data includes aggregate data analysis for the purposes of displaying user activity statistics for the Controller's Fanpage.
3. The responsibility of Meta Platforms Ireland with regard to data processing for the purposes stated above includes:
 - having legal grounds for the processing of data for the purposes of site statistics;
 - ensuring the rights of data subjects;
 - reporting violations to the regulatory authority and notifying affected persons of such incidents;
 - ensuring adequate technical and organizational measures to ensure the security of your data.
4. The Controller's responsibilities with regard to data processing:
 - having a legal basis for processing data for statistical purposes;
 - meeting information obligations with respect to the purposes of the processing carried out by the Controller.
5. Meta Platforms Ireland will make the essential content of the site statistics annex available to data subjects (Article 26(2) GDPR) through the data contained in the Site Dashboard, which can be accessed from all pages.
6. The Irish Data Protection Commission is the chief regulatory authority with regard to joint control of data (without prejudice to the provisions of Article 55(2) GDPR, where applicable).
7. Details of the mutual arrangements between Controllers are available at https://www.facebook.com/legal/terms/page_controller_addendum.
8. The rules applicable to the processing of your personal data by Meta Platforms Ireland are available at <https://www.facebook.com/privacy/explanation>.
9. For more information on how Meta Ireland processes personal data, the relevant legal grounds as well as the means for data subjects to exercise their rights with respect to Meta Ireland, please refer to Meta Ireland Privacy Policy at <https://www.facebook.com/about/privacy>.

§5 VISUAL SURVEILLANCE (CCTV) INFORMATION CLAUSE

1. ZAMEK Culture Centre in Poznań, with registered office at ul. Św. Marcin 80/82, 61-809 Poznań, is the Controller of your personal data.
2. With respect to personal data processing, you may contact the Controller's designated Data Protection Officer at iod@ckzamek.pl or in writing at the Controller's address.
3. Visual surveillance (CCTV) at Zamek Culture Centre covers lift entrances, lifts, service and technical rooms, passageways, basements and the adjoining outdoor area (car parks, courtyards, entrances to the building), as well as selected interiors.
4. Personal data from surveillance is processed by the Controller to ensure security of the staff and the visitors at Zamek Culture Centre as well as protect property, in accordance with Article 6(1)(c) GDPR in conjunction with Article 222 of the Labour Code Act of 26 June 1974. Furthermore, personal data is processed in line with legitimate interest of the Controller, where it concerns protection of persons and property (Article 6(1)(f) GDPR).
5. Personal data from surveillance may be made available to courts, law enforcement agencies, claims adjusters, IT service providers, and property protection services.
6. Your personal data will not be transferred outside the territory of Poland.
7. Surveillance footage will be stored by the Controller for a period of approximately 10 days, but no more than for 3 months from the date of recording. In order to obtain footage, appropriate request must be submitted within a maximum of 10 days from the date on which it was captured. However, in the event that surveillance footage constitutes evidence in proceedings under law or the Controller has been notified that it may constitute such evidence, the time limit specified above shall be extended until the proceedings are duly concluded.
8. You have the right to:
 - a. access your data;
 - b. rectify (correct) your data;
 - c. have your data erased;
 - d. restrict data processing;
 - e. object to data processing;
 - f. file a complaint with the President of the Office for Personal Data Protection.
9. By entering the premises of Zamek Culture Centre, you accept that personal data captured by visual surveillance is processed by the Controller. If you do not consent to being covered by visual surveillance, you will not be able to visit Zamek Culture Centre.
10. Your personal data will not be subject to automated processing or used for profiling.

§6 DATA SECURITY

The Controller has implemented technical and organizational measures to secure the collected personal data in accordance with the principles arising from the GDPR. The

Controller utilizes such data protection solutions as: SSL certificate on the site where data is collected for the newsletter, protection against unauthorized third-party access to the dataset.

§7 COOKIES

1. This website uses cookies.
2. A cookie is a small piece of textual information, sent by the server and saved on the user's device (usually on the hard disk). The parameters of cookies allow the information they contain to be read only by the server which generated them.
3. This website uses cookies to enable basic functions of the site such as navigation (essential cookies), to analyze user behavior on individual web pages (analytical cookies) and to tailor advertising (marketing cookies).
4. This website uses the following cookies:
 - a. essential technical cookies are indispensable for the proper operation of the website, including e.g. the so-called session ID, which enables correct navigation on the site. This is the only type of cookie that does not require the consent of the end user, as the data it contains are not used for any other purpose than to enable proper display of the website; they are deployed in line with the Controller's legitimate interest (Article 6 (1)(f) GDPR),
 - b. analytical cookies are used to collect information about user behavior on the website. Such information is provided anonymously, and collected following user's consent (Article 6(1)(a) GDPR). Ultimately, they help owners to customize their website to meet users' needs.

Analytical cookies include:

- i. GA, provided by Google, involves a unique identifier used to generate statistical data on how the site is used by the visitor, valid for 2 years
- ii. Gtag serves to distinguish between unique users, identify unique sessions of individual users, and collect information about how they use the site.
- iii. Hotjar uses cookies to collect data about users' behavior on the site, e.g. how much time they spend on particular subpages, which links they click on, how they navigate the cursor through the site, etc., as well as identifies the devices they use (e.g. type or size of device);
- c. marketing cookies are used to track users, offer advertisements that may of interest to a particular user based on the previously collected information concerning their preferences. They operate following user's consent (Article 6(1)(a) GDPR). Such cookies enable the advertiser to reach the audience more effectively.

These cookies used include:

- i. Facebook Pixel enables targeted, personalized ads to be displayed on the user's Facebook feed.

5. This website allows the user to change cookie preferences using a selection tool on the website. During their first visit to the website, the user has the right to decide which cookies may be used.
6. The user may also specify their preferences concerning the storage and use of cookies in the settings of their browser. Using this tool, the user may also delete cookies originating from this website.
7. Information on cookies in individual browsers is available on the following pages:
 - a. Chrome - <https://support.google.com/chrome/answer/95647?hl=pl&co=GENIE.Platform%3DDesktop>
 - b. Firefox - <https://support.mozilla.org/pl/kb/ciasteczka>
 - c. Microsoft Edge - <https://support.microsoft.com/pl-pl/microsoft-edge/usuwanie-plik%C3%B3w-cookie-w-przegl%C4%85darce-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
 - d. Safari - <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>
8. Withdrawing consent to cookies/disabling cookies may cause display issues with some sites or make some services inaccessible.
9. Withdrawing consent does not affect the lawfulness of the processing under consent prior to its withdrawal.

§8 GOOGLE ANALYTICS

1. This website uses Google Analytics, an analytics service from Google. Google Analytics is a system of statistics by means of which the Controller can obtain information about the users visiting the Controller's website. Types of user-related data which are collected and processed by Google Analytics include:
 - a. information about how the user found the website,
 - b. the region where the user is located,
 - c. the system and software used,
 - d. the manner and duration of user's interaction with the website.
2. Google Analytics is used under user's consent, in line with Article 6(1)(a) GDPR.
3. Cookie-generated information about user's activity on the website may be transferred to servers located outside the European Economic Area and the United Kingdom. The transmission of data by Google complies with decision of the European Commission regarding the approved the EU-U.S. Data Privacy Framework, available at <https://www.dataprivacyframework.gov/s/> or with standard contractual clauses approved by the European Commission.
4. The IP address transmitted by your browser through Google Analytics is not combined with other Google data.
5. The information generated by cookies regarding the User's activity on the website may be transferred to Google servers in the United States. The transfer of personal data to the USA is carried out in accordance with applicable data protection laws, in particular the principles laid down in the General Data Protection Regulation (GDPR).

Since 10 July 2023, the European Commission has adopted an adequacy decision for the United States under the EU–US Data Privacy Framework (DPF). This means that personal data may be transferred to entities in the USA that participate in the DPF and are included in the official list of certified organisations. Google is a participant in this programme; therefore, the transfer of data to this service provider is based on Article 45 GDPR, i.e., the adequacy decision. In cases where processing occurs outside the scope of the EU–US Data Privacy Framework, the safeguards provided for in the GDPR apply, such as standard contractual clauses (SCCs), combined with additional measures ensuring an adequate level of data protection.

6. User may disable collection of cookie-generated data about their use of the website, as well as disable processing of such data by Google using the solution described at <https://tools.google.com/dlpage/gaoptout>.
7. In order to modify the amount of shared data, users should verify their browser settings. A proportion of the information is shared automatically, but users may change the extent of transferred information at any time.
8. Additional information on the Google Analytics service is available at <https://support.google.com/analytics/answer/9019185?hl=pl#zippy=%2Ctematy-w-tym-artykule>.

§ 9 FINAL PROVISIONS

The Controller reserves the right to make changes to and update this Privacy Policy. Users will be notified of any such changes on our website, www.ckzamek.pl, under the Privacy Policy tab.