

GENERAL PROVISIONS

This privacy policy for the website available at www.citysofa.eu (hereinafter referred to as: the "Site" or "Website") is for information purposes only, meaning that it does not impose any obligations on users of the Site. The privacy policy primarily sets out the rules governing the processing of personal data by the Controller on the Website, including the legal basis, purposes and scope of personal data processing, as well as the rights of data subjects, and information regarding the use of cookies and analytical tools on the Website.

The Controller of personal data collected via the Website and its owner is:

STRATUS ONE SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, with its registered office in Poznań, entered in the Register of Entrepreneurs of the National Court Register under number 0000468306, the registry court where the company's documentation is held: Poznań-Nowe Miasto and Wilda District Court in Poznań, 8th Commercial Division of the National Court Register, registered office and address for service: ul. Dobromiejska 40, 60-461 Poznań, Tax Identification Number (NIP) 7811886171, REGON 302489013, share capital: PLN 5,000.00, email address: contact@citysofa.eu, telephone number: +48 668624620 (call charges apply as for a standard telephone call, in accordance with the service provider's tariff plan)

(hereinafter referred to as the "Controller" or "Owner").

Contact details of the Data Protection Officer appointed by the Controller: email: iod@citysofa.eu, telephone: +48 668624620.

Quick contact:

- email: contact@citysofa.eu
- telephone: +48 668624620 (call charges apply as for a standard telephone call, in accordance with the service provider's tariff plan)

Personal data on the Website is processed by the Controller in accordance with applicable law, in particular in accordance with Regulation (EU) 2016/679 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 the "GDPR" or "GDPR Regulation". Official text of the GDPR: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>

Use of the Website is voluntary. Similarly, the provision of personal data by users of the Website is voluntary, except where this is necessary to use certain features of the Website, including, for example, the contact form. Failure to provide, in the required cases and to the extent necessary, the personal data required to use a specific feature of the Website will result in the inability to use that feature. In each instance, the scope of data required to use a feature of the Website is indicated by the Controller on the Website (e.g. before completing the contact form).

The Controller takes particular care to protect the interests of the data subjects whose personal data it processes, and in particular is responsible for and ensures that the data it collects is: (1) processed lawfully; (2) collected for specified, lawful purposes and not subjected to further processing incompatible with those purposes; (3) factually correct and relevant to the purposes for which they are processed; (4) stored in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the data are processed; and (5) processed in a manner ensuring appropriate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organisational measures.

Taking into account the nature, scope, context and purposes of the processing, as well as the risk of varying likelihood and severity of the infringement of the rights or freedoms of natural persons, the Controller shall implement appropriate technical and organisational measures to ensure that the processing is carried out in accordance with this Regulation and to be able to demonstrate this. These measures shall be reviewed and updated as necessary. The Controller shall implement technical measures to prevent unauthorised persons from accessing or altering personal data transmitted electronically.

LEGAL DISCLAIMER

This Website is for information purposes only; it allows you to familiarise yourself with the Website Owner's products or services and to contact them, for example by submitting an enquiry via the contact form. A newsletter may also be available on the Website, the purpose of which is to provide information about the Website Owner's activities, news and new products and services offered by the Website Owner. The law applicable to the Website, these terms and conditions and any contracts concluded on the basis thereof is Polish law.

The Website is not an online shop and it is not possible to conclude a sales contract via it (this means, amongst other things, that advertisements, price lists and other information about products posted on the Website should not be treated as an offer, but rather as an invitation to conclude a contract). A sales contract may be concluded following a request for quotation addressed to the Website Owner and only after the parties have agreed on the specific terms of such a contract – however, the conclusion and terms of such a contract are governed by a separate sales contract or separate general terms and conditions of sale of products by the Website Owner, which will be made available by the Website Owner.

BASIS FOR DATA PROCESSING

The Controller is authorised to process personal data in cases where – and to the extent that – at least one of the following conditions is met: (1) the data subject has given consent to the processing of their personal data for one or more specified purposes; (2) processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract; (3) processing is necessary for compliance with a legal obligation to which the Controller is subject; or (4) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

The processing of personal data by the Controller requires, in each case, the existence of at least one of the grounds set out above. The specific grounds for the processing of Website Users' personal data by the Controller are set out in the following section of the privacy policy – in relation to the specific purpose of the processing of personal data by the Controller.

PURPOSE, LEGAL BASIS AND DURATION OF DATA PROCESSING ON THE WEBSITE

In each case, the purpose, legal basis, scope and recipients of the personal data processed by the Controller result from the actions taken by the relevant User on the Website.

The Controller may process personal data on the Website for the following purposes, on the following legal bases, for the following periods and to the following extent:

Purpose of data processing	Legal basis for data processing	Data retention period
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Performance of the contract for the provision of the Electronic Service or taking action at the request of the data subject prior to the conclusion of the contract	Article 6(1)(b) of the GDPR (performance of a contract) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Data is retained for the period necessary for the performance, termination or expiry of the contract for the provision of electronic services concluded with the Controller.
Sending commercial communications, including direct marketing, using telecommunications terminal equipment (e.g. email, telephone) or automated calling systems	Article 6(1)(f) of the GDPR (legitimate interests of the controller) – processing is necessary for the purposes of the Controller’s legitimate interests, which include direct marketing – consisting of safeguarding the interests and good reputation of the Controller and its Online Shop, and promoting the sale of Products – for example, in connection with the prior consent given by the data subject (e.g. when subscribing to the Newsletter), to the sending of commercial information using telecommunications terminal equipment, such as email or telephone, depending on the scope of the consent given	The data is stored for the duration of the legitimate interest pursued by the Controller, but for no longer than the limitation period for the Controller’s claims against the data subject arising from the Controller’s business activities. The limitation period is determined by law, in particular the Civil Code (the basic limitation period for claims relating to business activities is three years, and for a Sales Contract two years). The Controller may not process data for direct marketing purposes if the data subject has effectively objected to such processing. Furthermore, where the basis for processing is consent, the data is retained until the data subject withdraws their consent to the further processing of their data for the purpose specified in that consent, without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.
Establishing, exercising or defending claims that may be raised by the Controller or that may be raised against the Controller	Article 6(1)(f) of the GDPR – processing is necessary for the purposes of the legitimate interests pursued by the Controller – consisting in the establishment, exercise or defence of legal claims which the Controller may bring or which may be brought against the Controller	Data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than for the limitation period of claims against the data subject arising from the Controller’s business activities. The limitation period is determined by law, in particular the Civil Code (the basic limitation period for claims relating to the conduct of business activities is three years).
Use of the Website and ensuring its proper functioning	Article 6(1)(f) of the GDPR (legitimate interests of the controller) – processing is necessary for the purposes of the legitimate interests pursued by the Controller – consisting in the operation and maintenance of the Website	Data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than the limitation period for the Controller’s claims against the data subject arising from the Controller’s business activities. The limitation period is

		determined by law, in particular the Civil Code (the basic limitation period for claims relating to the conduct of business activities is three years).
Compilation of statistics and analysis of website traffic	Article 6(1)(f) of the GDPR (legitimate interests of the Controller) – processing is necessary for the purposes of the Controller’s legitimate interests – consisting of maintaining statistics and analysing traffic on the Website in order to improve the functioning of the Website	Data is stored for the duration of the legitimate interest pursued by the Controller, but for no longer than the limitation period for the Controller’s claims against the data subject arising from the Controller’s business activities. The limitation period is determined by law, in particular the Civil Code (the basic limitation period for claims relating to the conduct of business activities is three years).

DATA RECIPIENTS ON THE WEBSITE

For the Website to function properly, the Controller must use the services of external entities (such as, for example, a software provider). The Controller uses only the services of such processors who provide sufficient guarantees that appropriate technical and organisational measures will be implemented so that the processing meets the requirements of the GDPR and protects the rights of data subjects.

The Controller does not transfer data in every instance, nor to all recipients or categories of recipients specified in the privacy policy – the Controller transfers data only when it is necessary to achieve a specific purpose of personal data processing and only to the extent necessary to achieve that purpose.

Personal data may be transferred by the Controller to a third country; however, the Controller ensures that, in such cases, this will take place to a country providing an adequate level of protection – in accordance with the GDPR – and, in the case of other countries, that the transfer will be based on standard data protection clauses. The Controller ensures that the data subject has the opportunity to obtain a copy of their data. The Controller transfers the collected personal data only where and to the extent necessary to achieve the specific purpose of data processing in accordance with this privacy policy.

The personal data of Website Users may be transferred to the following recipients or categories of recipients:

- service providers supplying the Controller with technical, IT and organisational solutions enabling the Controller to conduct business activities, including the Website and the electronic services provided through it (in particular, suppliers of computer software for operating the Website, email and hosting providers, and suppliers of business management software and technical support to the Controller) – The Controller discloses the collected personal data of the Website user to a selected service provider acting on its behalf only where and to the extent necessary to achieve a specific data processing purpose in accordance with this privacy policy.
- legal and advisory service providers providing the Controller with accounting, legal or advisory support (in particular a law firm) – The Controller discloses the collected personal data of the Website user to a selected provider acting on its behalf only where and to the extent necessary to achieve the specific purpose of data processing in accordance with this privacy policy.

PROFILING ON THE WEBSITE

The GDPR imposes an obligation on the Controller to provide information on automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR, and – at least in such cases – relevant information on the principles governing such decision-making, as well as on the significance and anticipated consequences of such processing for the data subject. With this in mind, the Controller provides information in this section of the privacy policy regarding possible profiling.

Profiling on the Website involves the automatic analysis or prediction of a person's behaviour on the Website, for example by viewing a specific Product page on the Website. Such profiling requires the Controller to hold the person's personal data in order to subsequently send them, for example, a discount code.

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

RIGHTS OF THE DATA SUBJECT

Right of access, rectification, restriction, erasure or data portability – the data subject has the right to request from the Controller access to their personal data, its rectification, erasure ('right to be forgotten') or restriction of processing, and has the right to object to the processing, as well as the right to data portability. The specific conditions for exercising the above rights are set out in Articles 15–21 of the GDPR.

Right to withdraw consent at any time – a data subject whose data is processed by the Controller on the basis of consent (pursuant to Article 6(1)(a) or Article 9(2)(a) of the GDPR) has the right to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

Right to lodge a complaint with a supervisory authority – a data subject whose data is processed by the Controller has the right to lodge a complaint with a supervisory authority in the manner and procedure set out in the provisions of the GDPR and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office.

Right to object – the data subject has the right to object at any time – on grounds relating to their particular situation – to the processing of their personal data based on Article 6(1)(e) (public interest or public tasks) or (f) (the controller's legitimate interest), including profiling based on those provisions. In such a case, the controller may no longer process such personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

Right to object to direct marketing – where personal data is processed for the purposes of direct marketing, the data subject has the right at any time to object to the processing of their personal data for such marketing purposes, including profiling, to the extent that the processing is related to such direct marketing.

To exercise the rights referred to in this section of the privacy policy, you may contact the Controller by sending a written message or an email to the Controller's address indicated at the beginning of the privacy policy.

COOKIES ON THE WEBSITE AND ANALYTICS

Cookies are small pieces of information in the form of text files, sent by the server and stored on the visitor's device (e.g. on the hard drive of a computer, laptop, or on a smartphone's memory card – depending on the device used by the visitor to our website). Detailed information on cookies, as well as their history, can be found, amongst other places, here: https://pl.wikipedia.org/wiki/HTTP_cookie.

The Controller may provide a tool on the Website for the easy and active management of cookies – available upon first visiting the Website and subsequently accessible in the Website footer. Active management allows, amongst other things, for checking which cookies are or may be stored whilst using the Website, as well as for selecting and subsequently changing the scope and purposes of cookie use in relation to the device and the person visiting the Website. Upon starting to use the Website, the visitor will be asked to select cookie settings. It is possible to change these settings later by adjusting the settings within this tool available on the Website.

In the privacy policy, the Controller provides a range of information regarding the use of cookies on the Website, their types and purposes, and how to manage them using, for example, web browser settings and/or the cookie management tool available on the Website. The Controller encourages you to use the cookie management tool available on the Website, which allows you to easily and actively manage cookies whilst using the Website, and if this tool is unavailable, to review the information below regarding, amongst other things, managing cookies via your browser.

Cookies that may be sent by the Website can be divided into different types, according to the following criteria:

By provider: 1) first-party (created by the Administrator's Website) and 2) those belonging to third parties (other than the Administrator)	Based on their storage period on the device of the person visiting the Website: 1) session cookies (stored until the Website is left or the web browser is closed) and 2) persistent (stored for a specified period, defined by the parameters of each file, or until manually deleted)	Based on their purpose: 1) necessary (enabling the Website to function properly), 2) functional/preference (enabling the Website to be tailored to the visitor's preferences), 3) analytical and performance (collecting information on how the Website is used) marketing, advertising and social media (collecting information about the visitor to the Website in order to display advertisements to that person, personalise them, measure effectiveness and carry out other marketing activities, including on websites separate from this Website, such as social media platforms or other sites belonging to the same advertising networks as the Website)
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The Controller may process data contained in cookies when visitors use the Website for the following specific purposes:

Purposes of using the Administrator's Website cookies	to store data from completed forms (necessary and/or functional/preference cookies)
	to tailor the Website's content to the user's individual preferences (e.g. regarding colours, font size, page layout) and to optimise the use of the Website (functional/preference cookies)

	compiling anonymous statistics on how the Website is used (analytical and performance cookies)
	displaying and rendering advertisements, limiting the number of ad impressions and ignoring advertisements the user does not wish to see, measuring the effectiveness of advertisements, as well as personalising advertisements, i.e. analysing the behavioural characteristics of Website visitors through anonymous analysis of their actions (e.g. repeated visits to specific pages, keywords, etc.) in order to create a profile of them and provide them with advertisements tailored to their anticipated interests, including when they visit other websites within the advertising networks of Google Ireland Ltd. and Facebook, i.e. Meta Platforms Ireland Ltd. (marketing, advertising and social media cookies)

You can check which cookies (including their duration and provider) are currently being sent by the Website in the most popular web browsers as follows:

You can check which cookies are currently being sent by the Website, regardless of the web browser, using tools available, for example, at: <https://www.cookie-metrix.com> or <https://www.cookie-checker.com>.

By default, most web browsers available on the market accept cookies. Everyone has the option to specify the conditions for the use of cookies via their own web browser settings. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the saving of cookies – in the latter case, however, this may affect certain features of the Website.

Your web browser settings regarding cookies are relevant to your consent to the use of cookies by our Website – in accordance with the regulations, such consent may also be given through your web browser settings. Detailed information on changing cookie settings and deleting cookies yourself in the most popular web browsers is available in the browser's help section and on the following pages (simply click on the relevant link):

[in Chrome](#)

[in Firefox](#)

[in Opera](#)

[in Safari](#)

[in Microsoft Edge](#)

The Administrator may use Google Analytics and GA4 services on the Website, provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Administrator to compile statistics and analyse traffic on the Website. The data collected is processed within the framework of the above services to generate statistics that assist in the administration of the Website and the analysis of traffic on the Website. This data is of an aggregated nature. By using the above services on the Website, the Controller collects data such as the sources and channels through which visitors access the Website and their behaviour on the Website, information about the devices and browsers they use to visit the site, IP addresses and domains, geographical data, and demographic data (age, gender) and interests.

It is possible for a person to easily block the sharing of information about their activity on the Website with Google Analytics – for this purpose, for example, you can install a browser add-on provided by Google Ireland Ltd., available here: <https://tools.google.com/dlpage/gaoptout?hl=pl>

In connection with the Controller's use of services provided by Google Ireland Ltd. on the Website, the Controller notes that full information regarding the principles of processing personal data of Website visitors (including information stored in cookies) by Google Ireland Ltd. can be found in Google's privacy policy available at: <https://policies.google.com/technologies/partner-sites>

LINKS

The Website may contain links to other websites. The Controller urges you to familiarise yourself with the terms and conditions and privacy policy set out on those sites when visiting them. This privacy policy applies only to this Website.

CONTACT US

If you have any problems or questions regarding the use of the Website, or any other queries, please contact the Website Owner:

- email: contact@citysofa.eu
- telephone: +48 668624620 (call charges apply as for a standard telephone call, in accordance with your service provider's tariff plan).