

Privacy

for

zamelenerga.com

Hi, good morning!

If you're here, it's a sure sign that you value your privacy. We understand this perfectly, which is why we provide you with a document in which you will find in one place the rules for the processing of personal data and the use of cookies and other tracking technologies in connection with the functioning of the website <https://zamelenerga.com/>

Formal information at the beginning – the administrator of the website is ZAMEL SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, 1 Juliusza Słowackiego Street, 21-500 Biała Podlaska, NIP: 5372349871, KRS: 0000230948, share capital: 50000 PLN, registry court: District Court Lublin-Wschód in Lublin with its registered office in Świdnik, VI Commercial Division of the National Court Register.

This privacy policy has been structured in the form of questions and answers. The choice of this form was dictated by the care for the clarity and legibility of the information presented to you.

If you have any doubts about this privacy policy, you can contact us at any time by sending an email to info@zamelenerga.com.

#1: Who is the controller of your personal data?

The administrator of your personal data is ZAMEL SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, 1 Juliusza Słowackiego Street, 21-500 Biała Podlaska, NIP: 5372349871, KRS: 0000230948, share capital: 50000 PLN, registry court: District Court Lublin-Wschód in Lublin with its registered office in Świdnik, VI Commercial Division of the National Court Register.

#2: Who can you contact regarding the processing of your personal data?

As part of the implementation of personal data protection in our organization, we have decided not to appoint a personal data protection officer due to the fact that it is not mandatory in our situation. In matters related to the protection of personal data and broadly understood privacy, you can contact us at the e-mail address info@zamelenerga.com.

#3: What information do we have about you?

The scope of the processed personal data is indicated separately in relation to the individual purposes of personal data processing in Appendix 1 to the privacy policy.

In addition, we use tools that collect a range of information about you related to your use of our website. This includes, in particular, the following information:

- information about your device, operating system, and web browser
- user-ID
- IP address subject to shortening and anonymization
- date of page visit
- Viewed subpages
- time spent on the site

- transitions between individual subpages
- mouse clicks or screen touches
- clicks on individual links
- the source from which you go to the page
- the age range you are in
- Your gender
- Your approximate location limited to the locality
- Your interests based on your online activity
- This information is referred to in the following part of this privacy policy as "**Anonymous Information**"

Anonymous Information is not, in our opinion, personal information in itself because it does not allow us to identify you and we do not combine it with typical personal information we collect about you. Nevertheless, taking into account the strict jurisprudence of the Court of Justice of the European Union and the divided opinions among lawyers, out of caution, in case the nature of personal data is attributed to Anonymous Information, we have also included in this privacy policy detailed explanations regarding the processing of this information.

We are unable to provide you with access to Anonymous Information about you because we are unable to attribute any of the Anonymous Information to any particular user. From the level of tools collecting Anonymous Information, we only have access to a set of statistics and information not assigned to specific persons. Moreover, we do not have access to the information collected by some tools at all, as we are only interested in the proper functioning of the function provided by the tool, not the information collected by it. For example, a specific plug-in may collect some information, but it is not shared with us in any way, and we are not interested in this information at all, because we are only interested in the functionality of the plug-in (e.g. sending a newsletter form) simply to work. The Processing of Anonymous Information allows us to provide you with the functionality available on the website. In addition, Anonymous Information is used for analytical and statistical and marketing purposes, such as setting and targeting advertisements.

Because Anonymous Information is collected by external tools that we use, Anonymous Information is also processed by tool providers on the terms resulting from their terms and conditions and privacy policies. Anonymous Information is also used by the providers of individual tools to provide, manage, improve, develop new services, measure the effectiveness of advertising, protect against fraud and abuse, and personalize the content and advertising you see on individual services, sites, and applications.

The tools we use that involve the collection of Anonymous Information are listed in Appendix 2 to this privacy policy.

#4: Where do we get your personal information from?

In most cases, you provide it to us yourself. This happens when:

- you contact us via e-mail
- follow our social media profiles or interact with the content we publish on social media

- you submit a request related to the processing of personal data

In Appendix 1 to this privacy policy, we have assigned the source of data acquisition to each of the purposes of processing.

In addition, some information about you may be automatically collected by the tools we use:

- the website mechanism collects your IP address
- The third-party tools listed in Appendix 2 to this Privacy Policy collect Anonymous Information related to your activities on the Site

#5: Is Your Data Safe?

We care about the security of your personal data. We have analysed the risks associated with the various processing of your data and then implemented appropriate security and personal data protection measures. We monitor the condition of the technical infrastructure on an ongoing basis, train the staff, look at the procedures used, and introduce the necessary improvements. If you have any questions about your personal data, we are at your disposal at info@zamelenerga.com

#6: For what purposes do we process your personal data?

The purposes of the processing of your personal data are listed in Appendix 1 to this privacy policy.

#7: How long will we keep your personal information?

We store your personal data for as long as it is justified within the scope of a given purpose of personal data processing, therefore the processing periods vary depending on the purpose - their determination can be found in the table attached to the privacy policy.

Please note that the termination of the processing of your data for one purpose does not necessarily lead to the complete deletion or destruction of your personal data, as the data may be processed for another purpose for the period indicated for that purpose. For example, at the end of the correspondence exchange, we end the processing of personal data as part of the purpose of handling correspondence, but the data collected in connection with the handling of correspondence are still stored for the purpose of archiving them for the purpose of establishing, pursuing or defending claims related to correspondence. Complete deletion or destruction of data takes place when we have completed the implementation of all purposes, usually after the expiry of the limitation period for claims or the limitation period for administrative liability, or the period for which we are legally obliged to store certain data.

#8: Who are the recipients of your personal data?

We risk saying that modern business is not able to do without services provided by third parties. We also use such services. Some of these services involve the processing of your personal data. External service providers who are involved in the processing of your personal data are:

- a hosting provider that stores data on the server
- Email Provider
- cloud software providers in which data processing takes place
- an accounting office that processes your data visible on invoices

All the entities listed above process your data on the basis of personal data processing agreements concluded with us and guarantee an adequate level of personal data protection.

If necessary, your data may be made available to a legal advisor or an advocate bound by professional secrecy. The need may arise from the need to use legal assistance requiring access to your personal data.

In addition, when it comes to Anonymous Information, it is accessed by providers of tools or plug-ins that collect Anonymous Information. The providers of these tools are independent controllers of the data collected in them and may share this data on the terms set out by them in their own terms and privacy policies, which I have no influence on.

#9: Do we transfer your data to third countries or international organizations?

No, we do not transfer your data to third countries or international organizations.

#10: Do We Use Profiling? Do we make automated decisions based on your personal data?

We do not make decisions with respect to you based solely on automated processing, including profiling, which would have legal effects on you or similarly significantly affect you.

Yes, we do use tools that can take certain actions depending on the information collected by tracking mechanisms, but we believe that these actions do not have a significant impact on you, as they do not differentiate your situation as a customer, do not affect the terms of the contract you may have with us, etc.

By using certain tools, we can, for example, target you with personalized ads based on your previous actions on the site or suggest products that may be of interest to you. We are talking about the so-called behavioural advertising. We encourage you to learn more about behavioural advertising, in particular with regard to privacy issues. Detailed information, including the ability to manage your settings for behavioural advertising, can be found [here](#).

We emphasize that within the tools I use, I only have access to Anonymous Information. This information is stored on the servers of the providers of individual tools, and these servers can usually be located all over the world.

11: What rights do you have in connection with the processing of your personal data?

The GDPR grants you the following potential rights related to the processing of your personal data:

- the right to access your data and receive a copy of it,
- the right to rectify (correct) your data,
- the right to delete data (if in your opinion there are no grounds for us to process your data, you can request that we delete it),
- the right to restriction of data processing (you can request that we limit the processing of data only to their storage or performance of activities agreed with you, if in your opinion we have incorrect data or we process it unjustifiably),
- the right to object to the processing of data (you have the right to object to the processing of data on the basis of a legitimate interest; you should indicate a specific situation which, in your opinion, justifies our cessation of the processing covered by the objection; we will stop processing your data for these purposes, unless we demonstrate that the grounds for our

processing of data override your rights, or that your data is necessary for us to establish, pursue or defend claims),

- the right to data portability (you have the right to receive from us in a structured, commonly used and machine-readable format the personal data that you have provided to us on the basis of a contract or your consent; you can instruct us to send this data directly to another entity),
- the right to withdraw consent to the processing of personal data, if you have previously given such consent,
- the right to lodge a complaint with the supervisory authority (if you find that we process your data unlawfully, you can lodge a complaint with the President of the Office for Personal Data Protection or another competent supervisory authority).

The rules related to the exercise of the above-mentioned rights are described in detail in Articles 16 – 21 of the GDPR. We encourage you to familiarize yourself with these regulations. For our part, we consider it necessary to explain to you that the rights indicated above are not absolute and will not be available to you in relation to all processing activities of your personal data.

We emphasize that you always have one of the rights indicated above - if you believe that we have violated the provisions on the protection of personal data while processing your personal data, you have the right to lodge a complaint with the supervisory authority (the President of the Office for Personal Data Protection).

You can also always ask us to provide you with information about what data we have about you and for what purposes we process it. All you have to do is send a message to info@zamelenerga.com. However, we have made every effort to ensure that the information you are interested in is comprehensively presented in this privacy policy. You can also use the e-mail address provided above if you have any questions related to the processing of your personal data.

#12: Do we use cookies or other similar technologies and what exactly are they?

Our website, like almost all other websites, uses cookies and other similar technologies such as tracking codes or pixels, conversion APIs, etc.

With the use of cookies or other similar technologies, specific information can be collected and then used for various purposes, from ensuring the proper operation of individual functions of the website, through the analysis of user behavior on the website, to the targeting of targeted advertising.

If you want to learn more about cookies and other similar technologies, you can read e.g. these materials:

- [explanations about cookies](#),
- [explanations about tracking pixels](#),
- [explanation of the Conversions API](#).

#13: On what basis do we use cookies or other similar technologies?

We use cookies and other similar technologies on the basis of your consent, except when cookies or other similar technologies are necessary for the proper provision of electronic services to you.

Cookies or other similar technologies that are not necessary for the proper provision of electronic services remain blocked until you consent to the use of cookies or other similar technologies. When you visit the website for the first time, we display a message asking for your consent.

Please note that disabling or restricting cookies or other similar technologies may prevent you from using some of the features available on our website and may cause difficulties in using the website, as well as many other websites that use cookies or other similar technologies. For example, if you block social media plugin cookies, the buttons, widgets and social features implemented on the website may not be available to you.

#14: Can you disable cookies or other similar technologies?

Yes, you can manage the settings of cookies or other similar technologies within your web browser. You can block all or some cookies. You can also block cookies from specific websites. You can also delete previously stored cookies and other website and plug-in data at any time.

Web browsers also offer the option of using incognito mode. You can use it if you don't want information about the websites you've visited and downloaded files to be saved in your browsing and download history. Cookies created in incognito mode are deleted when you close all incognito windows.

There are also browser plug-ins available to control cookies, such as Ghostery (<https://www.ghostery.com>). The option to control cookies may also be provided by additional software, in particular antivirus packages, etc.

In addition, there are tools available on the Internet that allow you to control certain types of cookies, in particular to collectively manage behavioral advertising settings (e.g. www.youronlinechoices.com/, www.networkadvertising.org/choices).

Remember that disabling or limiting the use of cookies or other similar technologies may prevent the use of some of the functions available on our website and cause difficulties in using our website, as well as many other websites that use cookies. For example, if you block cookies from social media plugins, the buttons, widgets and social features implemented on our website may not be available to you.

15: For what purposes do we use first-party cookies?

First-party cookies are used to ensure the proper functioning of individual website mechanisms, such as the correct transmission of forms visible on the website.

First-party cookies also store information about your consent to cookies.

#16: What third-party cookies are used?

Our website uses cookies or other similar technologies of third parties related to the tools listed in Annex 2 to this privacy policy. Individual tools may use more than one cookie, but we have refrained from listing them in detail, not wanting to overwhelm you with an excess of information and assuming that it will be more readable for you to use a list of tools along with the purpose of using these tools than to list all the cookies or other similar technologies technically functioning within individual tools.

We have also refrained from indicating the scope of information collected in cookies in relation to each tool used, taking into account that each tool collects information related to your characteristics

and behaviour undertaken within our website. In this respect, we are dealing with Anonymous Information, which we have mentioned previously as part of this privacy policy.

Knowing the requirements created by the Court of Justice of the European Union, we have nevertheless refrained from indicating the lifespan of cookies used by individual tools. If we wanted to reliably determine the lifespan of each cookie, we would have to overwhelm you with an excess of information that would in no way implement the principle of transparency and readability of the information addressed to you. In addition, the lifespan of cookies may be subject to such active changes on the part of tool providers that we are not able to exercise reliable control over it. Refraining from determining the lifespan of cookies, we would like to remind you that the only option to really control the time of storing information in cookies is to manage cookies directly by you. From the level of your web browser, you can delete cookies stored on your device at any time.

At this point, we would like to emphasize once again that we do not have access to information that would allow us to identify you as part of cookies or other similar technologies. In this respect, we are dealing with Anonymous Information, which we have mentioned in this privacy policy.

What is more, while in the case of statistical and marketing tools we can view various types of reports generated on the basis of Anonymous Information, in relation to other tools we do not even gain any access to the information collected in cookies, being only interested in whether the functions of a given tool for which the tool has been installed work properly within our website.

#17: Do we track your behavior on our service?

Yes, we use tools that collect information about your activities on our website. These tools are listed in Appendix 2 to this privacy policy.

#18: Do we target you with targeted ads?

Yes, we use advertising tools where we can target specific target groups based on various criteria such as age, gender, interests, occupation, work, previous activities on our website. These tools are listed in Appendix 2 to this privacy policy.

§ 19: How can you manage your privacy?

The answer to this question can be found in many places in this privacy policy when describing individual tools, behavioural advertising, consent to cookies, etc. Nevertheless, for your convenience, we have collected this information once again in one place. Below you will find a list of options for managing your privacy.

- cookie settings within the web browser
- browser plugins that support cookie management, e.g. Ghostery
- additional software that manages cookies,
- Incognito mode in a web browser
- behavioral advertising settings, such as youronlinechoices.com
- settings on the side of third-party tool providers (links to settings have been collected as part of Appendix 2 to this Privacy Policy)

#20: What Are Server Logs?

Using the website involves sending queries to the server on which the website is stored. Each query directed to the server is saved in the server logs.

Logs include, m.in, your IP address, server date and time, information about your web browser and operating system. Logs are saved and stored on the server.

The data stored in the server logs are not associated with specific people using the website and are not used by us to identify you.

Server logs are only auxiliary material used to administer the website, and their content is not disclosed to anyone except for persons authorized to administer the server.

#21: Is There Anything Else You Should Know?

As you can see, the subject of personal data processing, the use of cookies and privacy management in general is quite complicated. We have made every effort to ensure that this document provides you with the most far-reaching knowledge on issues that are important to you. If anything is unclear to you, you want to know more or just talk about your privacy, please email us at info@zamelenerga.com.

#22: Is this privacy policy subject to change?

Yes, we can modify this privacy policy, in particular due to technological changes on the part of our website and changes in the law. If the change affects the rules for our processing of your personal data and we have your electronic contact details, you will receive a notification about each change in the privacy policy.

This Privacy Policy is effective from 2025-02-18

In addition, all archived versions of the privacy policy are linked below.

Appendix No. 1 - Purposes of personal data processing

Purpose of processing	Legal basis for processing	Scope of processed data	Data retention period	Source of data acquisition
Handling correspondence	Article 6(1)(f) of the GDPR – the legitimate interest pursued by the controller consisting in responding to messages sent to him.	Email address. Data contained in correspondence.	Until the end of the exchange of correspondence.	Incoming message.
Satisfaction survey	Article 6(1)(f) of the GDPR – legitimate interest pursued by the controller consisting in obtaining feedback from customers on completed purchases.	Data provided in the order form. Order details.	Until the satisfaction survey is completed.	Order form.

Purpose of processing	Legal basis for processing	Scope of processed data	Data retention period	Source of data acquisition
Social media support	Article 6(1)(f) of the GDPR – a legitimate interest pursued by the controller consisting in the operation of social media profiles.	The data is visible publicly in the user's profile on the social network. Details of user interaction within social media profiles.	Until the user deletes the data from the social network.	Social media profiles. Content posted by the user on social media.
Ad targeting	Article 6(1)(f) of the GDPR – legitimate interest pursued by the controller consisting in own marketing.	Email address. Anonymous Information.	Until the usefulness ceases or an objection is filed.	User account registration form. Order form. Newsletter subscription form. Tracking scripts.
Analysis and statistics	Article 6(1)(f) of the GDPR – a legitimate interest pursued by the administrator consisting in creating, viewing and analyzing statistics related to user activity on the website in order to draw conclusions allowing for subsequent optimization of the website.	Anonymous Information.	Until the usefulness ceases or an objection is filed.	Tracking scripts.
Telephone Marketing	Article 6(1)(f) of the GDPR – legitimate interest pursued by the controller consisting in own marketing.	Telephone number.	Until the consent to telephone marketing is withdrawn.	A form in which the user provides a phone number and at the same time agrees to telephone marketing.
Handling requests related to the processing of personal data	Article 6(1)(c) of the GDPR – implementation of obligations under the GDPR.	The data provided in the submitted request. Request body.	Until the request handler is complete.	Request related to the processing of personal data.
Archive	Article 6(1)(f) of the GDPR – a legitimate interest pursued by the controller consisting in securing data for the purposes of establishing, defending	Data of different scope, depending on what data we received and what scope of data is justified in terms of archival.	Until the expiry of the limitation period for claims or the limitation period for our liability related to the protection of personal data.	All forms used to transmit data.

Purpose of processing	Legal basis for processing	Scope of processed data	Data retention period	Source of data acquisition
	or pursuing claims and for the purpose of demonstrating compliance with the obligations under the GDPR.			

Appendix No. 2 - list of external tools

Tool	Supplier	Purpose of use	Provider Explanations	Provider settings
Google Analytics	Google LLC	Analysis and statistics related to the behavior of website visitors.	See	See
reCaptcha	Google LLC	Assessing whether the user visiting the website is a real human or a bot.	See	See
Google Ads	Google LLC	Ad measurement and targeting.	See	See
Meta Pixel	Meta Platforms, Inc.	Ad measurement and targeting.	See	See