

Privacy policy

General information

We pay particular attention to protection and processing of your personal data. We make every effort to ensure that the personal data entrusted to us is safe with us. We process it in accordance with the relevant legislation, in particular the General Data Protection Regulation (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/W). ("GDPR").

Below you will find information on how we process your personal data, how we keep it secure and information on what rights you have in relation to the personal data we collect.

Who is responsible for your personal data?

The Controller of your personal data is AIA Concept *Spółka z ograniczoną odpowiedzialnością* with its registered office in Częstochowa, ul. Śląska 15, 42-217 Częstochowa, KRS 0000858326, REGON 386946057, NIP 5732921073

What personal data we will process?

We will process the following personal data:

- Email address (where you create a user account on our mobile app or otherwise provide it to us);
- First name, last name, gender, year of birth (where you complete a user profile on our mobile app or you provide it to us in another way):
- Phone number (where you complete a user profile on our mobile app or you provide these to us in another way);
- Data collected in connection with your use of our website, which in certain circumstances may constitute
 personal data, such as in particular: Your IP address, request URL, device identifier, amount of time
 spent on particular pages, browser type, browser language, date and time of use of the website, screen
 resolution, operating system type and version (if you visit our website),

Principles of personal data processing

Where do we store your personal data?

Your personal data is stored in the European Economic Area (EEA). They may also be transferred outside this area and processed there. Any transfer of personal data is carried out in accordance with the applicable legislation.

In such situations, your data will only be transferred to countries that provide an adequate level of protection, and to countries that do not provide an adequate level of protection only if adequate safeguards are provided, including but not limited to standard contractual clauses adopted by the European Commission.

Who has access to your personal data?

As the Controller of your personal data, we never transfer, sell or exchange it for marketing purposes with other entities.

In some cases, we pass on your personal data with selected third parties for the sole purpose of performing defined services, which we perform for you.

Examples include companies that maintain our IT infrastructure or other IT-related services. However, we only pass on this data to the extent regulated by the personal data processing entrustment agreements signed with these entities

According to your consents, your personal data may be passed on to our business partners.

In the event that your personal data is forwarded to payment operators in connection with the processing and settlement of payments made by you on the Internet using payment instruments, the provision of data is required in order to process the payment and to transmit the confirmation of the payment by the aforementioned operators to us.



What is the purpose for which we process your personal data and what are the legal grounds for processing your personal data?

Legal grounds for processing	Purpose of personal data processing
Article 6(1)(a) of GDPR i.e. the consent of the person concerned	 to respond to enquiries made to us via email, contact form or to contact you in any other way you prefer; to send you newsletters and carry out other marketing activities beyond the legitimate interest of the controller, including tailoring the best offers of our services or the services of our partners to you or promoting them on social networks operated by us;
Article 6(1)(b) of GDPR, i.e. the necessity for the performance of a contract to which the person concerned is a party or to take steps at the request of the person concerned prior to entering into a contract	 to effectively enter into and perform contracts in relation to the services we provide (for example, to fulfil a sale or to maintain your user account on our mobile app); to effectively fulfil our obligations under the from handling the complaints process;
Article 6(1)(c) of the GDPR, i.e. the necessity to comply with a legal obligation imposed on the controller	to comply with legal obligations, in particular accounting and tax obligations arising in connection with a sale;
Article 6(1)(f) of GDPR, i.e. the necessity with regard to the purposes deriving from the legitimate interests pursued by the controller or by a third party	 to confirm performance of our duties, to be able to successfully assert or defend against claims against us, to detect fraud or attempt to prevent it; to carry out activities for marketing purposes relevant to our legitimate interest, including matching the best offer or promoting our products and services on social media sites operated by us; to produce compilations, analyses and statistics, including reporting, service development planning, development work, creation of statistical models, which is our legitimate interest to improve and develop the website

Providing your personal data is voluntary, however, failure to do so will prevent us from providing the specific services for which the personal data were supposed to be collected.

How long we will process your personal data?

The personal data you provide us with will be processed for a period:

- a) of time necessary for the performance of the contract concluded in the framework of the services provided by us, the performance of our obligations during their duration,
- b) of 5 years, starting from the first day of the year following the year in which the business relationship with the customer is terminated or in which the occasional transaction was carried out, in order to comply with a legal obligation, to assert or defend against claims,
- until you withdraw your consent or object when we carry out activities for marketing purposes, on the basis of separately expressed consents or in the context of processing on the basis of our legitimate interest,
- d) of time of the correspondence in the case of data provided in connection with email or telephone contact.
 - Okres przetwarzania danych może być w każdym przypadku przedłużony, jeżeli dalsze przechowywanie danych uzasadnione jest terminem przedawnienia roszczeń lub wynika z powszechnie obowiązujących przepisów prawa albo uzasadnione jest naszym nadrzędnym interesem, wynikającym z realizacji prawnie uzasadnionych interesów. W każdym przypadku decyduje dłuższy termin przechowywania danych osobowych.



What rights you have in relation to our processing of your personal data under GDPR legislation?

Right of access to data:

You have the right to request information about what personal data we hold at any time. To obtain such information, please contact us.

Right of transfer:

In the event that we process your personal data by automated means, based on the consent you have given us or the contract you have entered into, you have the right to receive a copy of your data in a structured, commonly used and readable format. This copy may be sent to you directly or to another entity designated by you and relates only to the personal data you have provided to us.

Right to make corrections to your data:

You have the right to request the correction of your personal data at any time if it is incorrect, and to complete any incomplete data. To do so, please contact us.

Right to delete data:

You have the right to delete the personal data we process at any time. Please note, however, that this right is not absolute and, as The Controller, we may refuse to erase those data for which we have a basis for processing (e.g. to comply with a legal obligation or to assert or defend against claims that may be made against us).

The right to object to processing on the basis of legitimate interest:

You have the right to object at any time to processing of your personal data, to the extent that we process this data on the basis of a legitimate interest of the Controller. We will then cease processing your personal data unless we can find a lawful justification for this process that invalidates your interest or rights. You will, of course, be informed about this.

Right not to agree to direct marketing:

You have the right not to agree to receive direct marketing materials, including preparation of an analysis of your profile that is prepared for the purpose of preparing such materials.

You also have the right to withdraw your consent at any time without affecting the compatibility of the lawfulness of processing carried out on the basis of consent before its withdrawal.

Right to restrict:

You have the right to request restriction of your personal data processing at any time under the following conditions:

- if you do not agree to processing your data on the basis of a legitimate interest of the Controller, then we will restrict any processing of such data once we have verified that such a legitimate interest exists.
- if you report that the personal data processed is inaccurate, then we will restrict any processing of such data until we have verified its accuracy.
- if the processing is unlawful, then you may object to erasure of your personal data and instead request that we restrict the use of your personal data.
- if we no longer need your personal data, but it is required to pursue claims or defend against claims.

Automated data processing

Personal Data of the mobile application Users may be processed in an automated manner (profiling), by using it to evaluate certain information about the User, in particular to analyse or forecast his/her personal preferences and interests.

How can you exercise your rights?



We take the protection of privacy and the correctness of personal data processing very seriously, so we have appointed a team of staff to respond exclusively to questions regarding the above. You can contact them in the following ways:

- by sending an email to kontakt@aiaconcept.com
- by writing to our registered office address: AIA Concept sp. z o.o. z siedzibą w Częstochowie, ul. Śląska 15, 42-217 Częstochowa,

If you feel that we are processing your personal data in an inappropriate manner, please contact us. You also have the right to lodge a complaint with the supervisory authority, which is The President of Personal Data Protection Office.

What are cookie files?

Our website uses cookie files technology as well as functionality similar to it. Cookie files are stored on the final device of the person visiting the website. Each visitor to the website has the possibility to choose the scope of application of cookie files and then give the consent within the so-called cookie banner displayed during their first visit to the website.

Cookie files are computer data, in particular text files, which are stored in the final device of the person visiting the website and are intended for the use of the website. Cookie files usually contain the name of the website they come from, the time they are stored on the end device and a unique number.

Cookie files are used primarily to ensure the proper functioning of the website. Depending on the visitor's choice of the scope of use of cookie files, cookie files may also be used for other purposes, such as creation of statistics which help to understand how users use the website, which makes it possible to improve its structure and content, as well as for marketing purposes consisting, among others, reaching the visitors who have previously visited the website with an advertising message when they use other websites or social networks (to this extent, cookie files of third parties, i.e. providers of tools used by The Controller for this purpose, may also be used).

Depending on the choice of the extent to which cookie files are used, they collect various types of information which, in principle, do not constitute personal data. However, some of the information collected in this way, depending on the type of cookie files, may contain information that makes it possible to identify the visitor of the website, in particular when linked to other data. This applies in particular to cookie files, the use of which requires consent of the website visitor. Other provisions of the Privacy Policy shall apply to such information, including in particular the rights of the person concerned.

Detailed information regarding the scope and types of cookie files used within the website can be found within the cookie banner displayed during the first visit to the website, as well as by clicking on the "Cookie files settings" button. In the same way, the visitor of the website can change his/her preferences regarding the use of cookie files at any time, including withdrawal of previously granted consents, without affecting the legality of the actions performed on the basis of the consent before its withdrawal.

In terms of ensuring the proper operation of the website, cookie files are used on the basis of Article 173 (3) point 2 of the Telecommunications Law. In the remaining scope, obtaining and storing information with the use of cookies takes place on the basis of consent of the website visitor, expressed within the framework of a cookie banner displayed during the first visit to the website, or as a result of changing the settings by clicking on the "Cookie files settings" button.

To the extent that cookie files may contain information constituting personal data, the basis for their processing is the legitimate interest of the Controller (Article 6 (1) point (f) of the GDPR) in the form of, i.a., research and analysis of website traffic for statistical purposes, as well as the conduct of marketing activities by the Controller or third parties. To the extent that these third parties will have direct access to such information, the legal basis for such processing will be the legitimate interest of these third parties or the separate consent given by the visitor (e.g. within the privacy settings of a social network site). To the extent that the information collected through the cookie files is necessary for the proper provision of electronic services on the website, the basis for the processing of such information is Article 6 (1) letter b) of the GDPR.

Depending on the purposes and legal basis for the processing of personal data, the information collected by cookie files may be stored for different periods of time. Information on the storage period of information collected by individual cookies can be found within the cookie banner displayed when you first visit the Website, as well as by clicking on the "Cookie files Settings" button. In the event that the information collected by cookie files constitutes personal data, it will generally be stored until you object. Personal data may also be stored until the statute of limitations for claims or for the time required by law. In each case, the longer period for storing personal data shall be decisive.



The Website uses marketing and analytical tools from other providers who use cookie files (third-party cookie files) on the Website. The providers of these tools are the entities listed in the section below. For more information on the cookie files of these entities, please refer to their privacy policies. The Website visitor's final device may store cookie files from these third parties, who may be their own controllers or act as joint controllers with the Controller.

The website uses marketing and analytical tools provided by the following entities that use external cookies:

- 1) Google Ireland Limited,
- 2) Facebook Ireland Limited,
- 3) Hotjar Limited,
- 4) LinkedIn Ireland Unlimited Company

Some of the above-mentioned providers may store your data outside the European Economic Area. In such situations, your data will be transferred only to countries that provide an adequate level of protection and to countries that do not provide an adequate level of protection only if adequate safeguards are provided, including but not limited to standard contractual clauses adopted by the European Commission.

The website also uses additional functions of Google Analytics (Google Analytics Advertising Functions). You can change this through the relevant settings of your browser, but also through your Google Ads preference settings.

Final provisions

The Privacy Policy may need to be updated in the future. Its latest version can be found in our mobile application or website.

In matters not covered by this Policy, the provisions of the Civil Code and relevant acts of Polish law, as well as the law of the European Union, in particular GDPR (Regulation 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016. on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC).