

PRIVACY POLICY AND COOKIES POLICY

§1 General provisions

1. The Administrator of the Service Recipient's personal data provided to the Service Provider in the course of the Service Provider's provision of electronic services is Anna Rosowicz-Lipowczan conducting business under the name CRA Anna Rosowicz-Lipowczan, NIP: 6792677080, Level 5 & 6, Louis Vuitton Orjin Building Abdi Ipekci Bostan Street 15 Nisantasi Sisli Istanbul Turkey 34367.
2. The Service Provider declares that the Service Recipient's personal data will not be transferred to third countries or international organizations.
3. The Service Provider provides a contact email for Service Recipients: contact@clinicals.pl.
4. The meaning given to terms under §2 of the Terms and Conditions shall also apply in this Privacy Policy and Cookies Policy.

§2 Data processing

1. The Service Provider processes the data of the Service Recipients, i.e. identifiers and information collected through cookies, name, surname, e-mail address.
2. The Service Provider processes the data of the Service Recipients using the website for the following purposes:
 - a) to handle enquiries/complaints, and the basis of the processing is the necessity for the performance of the contract in accordance with the provision of Article 6(1)(b) GDPR,
 - b) the handling of complaints, and the basis of the processing is a legal obligation in accordance with the provision of Article 6(1)(c) GDPR,
 - c) technical, administrative in connection with the need to ensure the security of the IT system and its administration, and the basis for the processing is the legitimate interest of the Service Provider in accordance with the provision of Article 6(1)(f) GDPR to ensure an adequate level of data protection,
 - d) analytical and statistical - and the basis of the processing is the legitimate interest of the Service Provider in accordance with the provision of Article 6(1)(f) GDPR consisting of conducting analyses of the activity of the Service Recipients, improving the functionality,
 - e) to conduct email correspondence between the Service Provider and the Service Recipient in relation to the Service Provider's business activities, and the basis of the processing is the Service Provider's legitimate interest in accordance with the provision of Article 6(1)(f) of the GDPR to conduct correspondence in relation to the Service Provider's business activities,
 - f) the investigation or establishment of claims or the defence against them, and the basis of the processing is the legitimate interest of the Service Provider in

accordance with the provision of Article 6(1)(f) of the GDPR, in relation to the protection of its rights,

- g) marketing, and the basis of the processing is the legitimate interest of the Service Provider in accordance with the provision of Article 6(1)(f) GDPR, in relation to the protection of his rights.
3. The data is processed in connection with the performance of the contract, on the basis of consent, as a result of the performance of a legal obligation and on the basis of the controller's legitimate interest, as referred to in the provision of Article 6(1)(b)(c), (f) GDPR.
 4. The provision of data by the Service Recipient in the context of sending an enquiry is a contractual requirement. The Service Recipient is entitled to provide this data and any failure to do so will prevent the provision of services.
 5. Failure by the Client to provide personal data that the Service Provider processes under the provision of Article 6(1)(c) will prevent the Service Provider from fulfilling its legal obligation.
 6. Failure by the Client to provide personal data which the Service Provider processes on the basis of a legitimate interest will prevent the Service Provider from pursuing those legitimate interests.

§3 Recipients of data

1. To the extent necessary, the Service Provider shall transfer the Client's personal data to external entities, in particular IT service providers, payment services, banks and accounting services providers.
2. The Service Provider reserves the right to disclose the Client's personal data to the competent authorities or third parties who make a request in this regard in accordance with the provisions of generally applicable law.
3. The transfer of personal data shall take place on the basis of the personal data entrustment agreement referred to in the provision of Article 28(3) GDPR.
4. The Service Provider shall keep a register of personal data processing activities. This register shall contain:
 - a) name and surname, as well as contact details of the Service Provider,
 - b) the purposes of personal data processing,
 - c) a description of the categories of data subjects and categories of personal data,
 - d) entities to which the Service Recipient's personal data was transferred,
 - e) information on the transfer of personal data to a third country,
 - f) planned deadlines for deleting individual categories of data,
 - g) a general description of the technical and organisational security measures.

§4 Rights of the Service Recipient

1. The Service Recipient has the right to permanent access to his personal data. The Service Recipient has the right to rectify the personal data placed on the basis of the provision of art. 16 of the GDPR.
2. The Service Recipient has the right to request the deletion of his personal data on the basis of the provision of art. 17 of the GDPR.
3. The provision of §4(2) shall not apply to the extent that processing is necessary on the basis of Article 17(3)(e) of the GDPR.
4. The Service Recipient has the right to obtain confirmation of the processing of his personal data, information about the purposes of processing, categories of personal data, as well as information about the sources of data acquisition, if they have not been obtained from the Service Recipient.
5. The Service Recipient has the right to request the restriction of the processing of his personal data by the Service Provider, in accordance with the provision of Article 18 of the GDPR.
6. The Service Recipient has the right to object to the processing of his personal data, in accordance with the provision of art. 21 of the GDPR.
7. The Service Recipient has the right to lodge a complaint with the President of the Office for Personal Data Protection if he considers that there has been a violation of the provisions on the protection of personal data.
8. Without prejudice to the right indicated in paragraph 8, the Service Recipient, pursuant to the provision of Article 79 paragraph 1 of the GDPR, has the right to assert his rights in court.
9. The Service Recipient has the right to receive from the Service Provider, in a PDF file, personal data previously provided to the Service Provider.
10. At the request of the Service Recipient, the Service Provider is obliged to transfer personal data, in the form specified in paragraph 10, to another administrator in accordance with the provisions of generally applicable law.
11. The rights referred to in §4, with the exception of paragraphs 8 - 9, are exercised by the Service Recipient via e-mail, by indicating his request in an e-mail message. The Service Provider is obliged to immediately respond to the Service Recipient's request.

§5 Data security

1. The personal data of the Service Recipients shall be stored by the Service Provider for a period no longer than is necessary for the purposes for which the data is processed, in accordance with the provision of Article 5(1)(e) of Regulation (EU) 2016/ 679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, in principle for the period of limitation of civil law claims.
2. The Service Provider shall protect the personal data provided to it. This is done in particular through encryption, the use of a secure protocol, pseudonymisation, ensuring the confidentiality, integrity, availability and resilience of the processing systems and

services, the ability to quickly restore the availability of and access to personal data and the regular evaluation of the effectiveness of the technical measures to ensure security.

3. The Service Provider shall ensure that personal data are processed in a secure manner, with access only to authorised persons to the extent necessary for the tasks to be performed.
4. The Service Provider informs the supervisory authority of security breaches concerning personal data, in accordance with the provision of Art. 33 GDPR. The Service Provider shall document breaches of personal data protection.
5. The Service Provider shall notify the data subject of such a breach in accordance with the provision of Article 34 of the GDPR.
6. The Service Provider shall not share the Client's personal data with third parties, subject to §3 section 1, section 2.

§6 Cookies policy

1. The website uses cookies and other similar technologies - this means IT data stored on the end user's device, in particular files with the name of the website, the time of storage on the end user's device and a unique number.
2. Cookies are used for the use of the website.
3. The Service Provider receives information regarding the browser, software and end device through cookies.
4. The Service Provider places cookies on the end device and accesses them.
5. The website uses:
 - a) "essential" cookies: they are necessary for the proper functioning of the website,
 - b) "functional" cookies: they remember and adapt the website, e.g. to. language preferences. Blocking functional cookies may cause the website to not work properly,
 - c) "third-party" cookies: this is information from third-party servers. Cookies are used by the Service Provider to display the website correctly, for statistical purposes, to optimize the website, marketing its own services.
6. The Service Recipient has the option of changing the settings of "cookies" in the appropriate tab on the website.