

PRIVACY POLICY OF THE WWW.EDUBEARS.COM WEBSITE

§ 1

[General information]

1. The website www.edubears.com (hereinafter referred to as: the "Website") is maintained by Edu Bears sp. z o.o. sp. k. with its registered office at: Pszczyńska 69, 41-100 Gliwice, tax identification number (NIP): 631 266 05 60, REGON: 363 507 143, KRS 0000748549, registered at Regional Court in Gliwice, X Commercial Division of the National Court Register, e-mail: office@edubears.pl (hereinafter referred to as: the "Data Controller").
2. The data of website Users (hereinafter referred to as: the "Users"), including personal data, may be collected, processed and used within the framework of the Website activity.
3. Users' data may be collected as a result of: voluntary providing thereof by the Users themselves, use of cookies.
4. Additionally, the information on User's IP address, query arrival and question sending time, address of a website from which a User was redirected to the Website and a type of software used by a User may be collected. This information is used for the purpose of the Website administration and creation of statistics and analysis.

§ 2

[Personal data]

1. The Data Controller of Users' personal data is Edu Bears sp. z o.o. sp. k. with its registered office at: Pszczyńska 69, 41-100 Gliwice, tax identification number (NIP): 631 266 05 60, REGON: 363 507 143, KRS 0000748549, registered at Regional Court in Gliwice, X Commercial Division of the National Court Register, e-mail: office@edubears.pl.
2. The Data Controller through the Website may collect and process the personal data for the purpose of:
 - 1) contacting with a User if they have completed the contact form;
 - 2) providing proper operation of the Website functionality (strictly necessary cookies);
 - 3) displaying a comment posted by a User under a blog entry;
 - 4) conducting direct marketing of its own products and services by the Data Controller, including sending the newsletter;
 - 5) conclusion and performance of a contract of sale regarding the access to online courses, namely the contract whose party is a person whose data is considered;
 - 6) creation of the statistics and analysis of Users' browsing habits (performance and analytics cookies).
3. Data Controller shall process personal data in accordance with the following legislation:
 - 1) in the case of processing data with the aim of contacting a User – in virtue of the legitimate interests pursued by the Data Controller, which constitute an answer to a question asked by a User (under Article 6 (1)(f) of the GDPR);
 - 2) in the case of processing data with the aim of providing proper operation of the Website functionality – in virtue of processing necessary for the performance of a contract (under Article 6 (1)(b) of the GDPR);
 - 3) in the case of processing data with the aim of displaying a comment posted by a User – in virtue of the legitimate interests pursued by the Data Controller, which constitute the publication of a User's comment (under Article 6 (1)(f) of the GDPR);
 - 4) in the case of processing data with the aim of conducting direct marketing of its own products and services by the Data Controller, including sending the newsletter – in virtue of the legitimate interests pursued by the Data Controller, which constitute the promotion of the activities of the Data Controller (under Article 6 (1)(f) of the GDPR);
 - 5) in the case of processing data with the aim of conclusion and performance of a contract of sale regarding the access to online courses – in virtue of the processing necessary for the performance of a contract (under Article 6 (1)(b) of the GDPR);
 - 6) in the case of processing data with the aim of creating statistics and analyses - in virtue of the legitimate interests pursued by the Data Controller, which constitute the verification of the manner in which Users use the Website (under Article 6 (1)(f) of the GDPR).
4. The Data Controller may share the Users' data with its subcontractors (entities of which services the Data Controller uses while processing) such as service and software solutions providers.

5. The Data Controller may use IT service providers established outside the European Economic Area. Therefore, the User’s data may be transmitted outside the EEA. The Data Controller shall use entities that process personal data in virtue of standard data protection clauses adopted by the European Commission pursuant to Article 46 of the GDPR and entered into between the Data Controller and that entity.
6. In the event of data processed with the aim of contacting a User and creating statistic and analysis of the users’ browsing habits, the Data Controller may process the data for and during a period of three years from the date collection thereof. The comment with the information on the author thereof posted by a User is displayed as long as the article is available.
7. In the event of data processed with the aim of conducting direct marketing of its own products and services by the Data Controller, including sending the newsletter, the Data Controller may process data until the User objects to the processing or until the consent to receive commercial information is revoked.
8. In the event of data processed with the aim of conclusion and performance of contracts, the Data Controller may process data for the duration of contracts performance as well as for the period necessary for pursuing one’s own claims or defence against claims lodged against the Data Controller regarding the contract performance.
9. The following rights are guaranteed to the User whose data is considered:
 - 1) the right of access to personal data including the right to obtain a copy thereof;
 - 2) the right to obtain the rectification of personal data;
 - 3) the right to obtain the erasure of personal data;
 - 4) the right to obtain restriction of processing personal data;
 - 5) the right to transmit personal data;
 - 6) the right to object to processing of personal data;
 - 7) the right to lodge a complaint with a supervisory authority;

In order to exercise any right referred hereinabove, the User should contact the Data Controller.

§ 3 [Cookies]

1. Cookies stored on the Users’ end devices shall be used within the framework of the Website activity. The usage of cookies shall be understood as the storage thereof and the access obtainment thereto by the Data Controller.
2. Cookies constitute information data, text files in particular, which are stored on the User’s end device and meant to be employed while using websites. Cookies usually contain the name of a website from which they emerged, storage time on the end device, the content (for instance, cookie identifier) and a unique number.
3. Due to the time period for which cookies are installed on the User’s end device, cookies used in the frames of the Website may be divided into two main types:
 - 1) **session cookies** (session storage) – these are temporary cookies which are stored on the User’s end device until the session expires (for instance, leaving the Website, deleting cookies by a User or disabling the software);
 - 2) **permanent cookies** (persistent cookies, local storage) – these cookies are stored on the User’s end device for a particular time specified in the cookies parameters or until they are deleted by the User.
4. Depending on the purpose of the cookies use, they may be divided into:
 - 1) **strictly necessary cookies** – they enable to use the basic functions of the Website, including user login and account management. Lack of the strictly necessary cookies results in the Website working improperly.
 - 2) **performance cookies** – they gather information on how visitors use a website, for instance analytics cookies. These cookies shall not be used to direct identification of a particular user.
 - 3) **analytics cookies** – they are used for the identification of visitors switching between various websites, for instance, third-party content partners, advertising networks. These cookies may be used by the companies to create user interest profiles or display relevant advertisements on other websites.
5. The Data Controller, within the scope of the Website, shall use the following cookies:

Strictly necessary cookies					
Cookie key	Domain	Path	Cookie type	Expiration	Description
cf_bm More info	.hubspot.com	/	Third-party	30 minutes	This cookie is used to distinguish between humans and bots. This is beneficial for the

					website, in order to make valid reports on the use of their website.
<u>_GRECAPTCHA</u> More info	www.google.com	/recaptcha	Third-party	6 months	Google reCAPTCHA sets a necessary cookie (_GRECAPTCHA) when executed for the purpose of providing its risk analysis.
CookieScript Consent More info	edubears.com	/	First-party	1 month	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.
Performance cookies					
Cookie key	Domain	Path	Cookie type	Expiration	Description
<u>__hssc</u> More info	edubears.com	/	First-party	30 minutes	This cookie name is associated with websites built on the HubSpot platform. It is reported by them as being used for website analytics.
<u>_gid</u> More info	.edubears.com	/	First-party	1 day	This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.
<u>__hsrc</u> More info	edubears.com	/	First-party	Session	This cookie name is associated with websites built on the HubSpot platform. It is reported by them as being used for website analytics.
<u>_gat_UA-143255261-1</u> More info	.edubears.com	/	First-party	1 minute	This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to. It is a variation of the _gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites.
<u>__hstc</u> More info	edubears.com	/	First-party	6 months	This cookie name is associated with websites built on the HubSpot platform. It is reported by them as being used for website analytics.
<u>_ga</u> More info	.edubears.com	/	First-party	2 years	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.
Targeting cookies					

Cookie key	Domain	Path	Cookie type	Expiration	Description
_fbp More info	.edubears.com	/	First-party	3 months	Used by Meta to deliver a series of advertisement products such as real time bidding from third party advertisers
Functionality cookies					
Cookie key	Domain	Path	Cookie type	Expiration	Description
hubspotutk More info	edubears.com	/	First-party	6 months	This cookie name is associated with websites built on the HubSpot platform. HubSpot report that its purpose is user authentication. As a persistent rather than a session cookie it cannot be classified as Strictly Necessary.
Unclassified cookies					
Cookie key	Domain	Path	Cookie type	Expiration	Description
nsr More info	edubears.com	/	First-party	Session	

6. The default settings of web browsers usually allow the saving of necessary cookies on end devices of website Users. However, the aforementioned settings may be changed by the User.
7. Personal data shall be processed in relation to the use of performance and analytics cookies solely upon the User's acceptance of the application of cookies hereinabove. The acceptance shall be obtained in connection with the use of the Website and it may be revoked at any time by choosing the right option in the cookies settings available on the Website.
8. Notwithstanding the above, the User shall be able to determine the conditions of the use of cookies by means of the setting of a software (of a web browser) installed on the end device thereof. The change may consist in partial or complete limitation of the possibility of saving cookies on the User's end device whereby it may cause improper display of the content of the Website.
9. The use of cookies shall not cause any changes in the configuration of the User's end device or in software installed thereon.
10. Detailed information on how to adjust the browser settings related to cookies and deletion thereof may be obtained from the official website of a particular browser. The information hereinabove may be found under the following website addresses:
 - 1) [Firefox browser](#);
 - 2) [Chrome browser](#);
 - 3) [Microsoft Edge browser](#);
 - 4) [Opera browser](#);
 - 5) [Safari browser](#).