

## Privacy & Cookies Policy

### I. GENERAL PROVISIONS

1. This privacy and cookie policy describes the rules for dealing with personal data and the use of cookies as part of the <https://canaluminair.com> website (hereinafter referred to as the "Website").
2. The administrator of personal data collected through the Website is Commodities Management Services Sp. z o.o. 02-541 Warsaw, Narbutta 30, with NIP number PL 9591284808, REGON 290995647, entered into the National Court Register under the number 0000084866 (hereinafter referred to as "Administrator").
3. Contact with the Administrator is possible at the e-mail address: [office@cm-services.pl](mailto:office@cm-services.pl) or by phone: 22 376 99 00, fax: 22 376 99 99 (Mon - Fri: 9.00 - 17.00).
4. Each entity using the Website is its User.
5. The Website User's personal data are processed by the Administrator in accordance with applicable law, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of physical persons in connection with 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 "GDPR").
6. In order to exercise the User's rights described in the further part of the Policy, please contact the Administrator or the Data Protection Officer at the e-mail addresses indicated above.

### II. PROCESSING OF PERSONAL DATA

#### 7. Contact form

The User's personal data sent to the Administrator via the Contact Form will be processed in order to answer the question asked. The legal basis for the processing of personal data is Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Administrator, which is communication with the Website User. In the event that the User asks the Administrator to present a commercial offer, his personal data will be processed on the basis of Article 6(1)(b) of the GDPR, i.e. activities aimed at concluding a contract. The User's personal data will be processed for the period necessary to handle the correspondence, extended accordingly by the period resulting from the relationship between the correspondence and the concluded legal relationship (e.g. concluded contract), archiving obligations, pursuing possible claims or other obligations required by generally applicable law. The User's personal data may also be processed in order to direct marketing and commercial content regarding the Administrator's offer by phone or e-mail (depending on the data provided) – the legal basis is expressed for this purpose consent (Article 6(1)(a) of the GDPR). These data will be processed until you withdraw your consent to receive marketing and commercial content by phone or e-mail. The User has the right to access the content of his personal data, the right to request their rectification, deletion and limitation of processing, the right to transfer data, if the processing is based on the consent expressed for this purpose and the right to object to their processing, if it takes place on the basis of law

legitimate interest. User has the right to withdraw his consent at any time, without affecting the lawfulness of the processing that has been carried out on the basis of consent before its withdrawal. The User has the right to lodge a complaint with the President of the Office for Personal Data Protection if he considers that his personal data is being processed unlawfully. Providing personal data is voluntary, but necessary in order to respond to the message sent by the User.

### III. DATA RECIPIENTS

8. Users' personal data may be processed by the Administrator's subcontractors, i.e. entities whose services are used by the Administrator.
9. The Administrator uses only the services of such processors who provide sufficient guarantees for the implementation of appropriate technical and organizational measures so that the processing meets the requirements of the GDPR and protects the rights of data subjects.
10. The transfer of data by the Administrator does not take place in every case and not to all recipients or categories of recipients indicated in the privacy policy – the Administrator transfers data only if it is necessary to achieve a given purpose of personal data processing and only to the extent necessary to achieve it.
11. Users' personal data may be transferred to the following recipients or categories of recipients:
  - a) service providers supplying the Administrator with IT, technical and organizational solutions enabling the Administrator to conduct the company's operations, including the website and electronic services provided through it (in particular, providers of computer software for running the Website, providers of e-mail and hosting and software providers for managing the company and providing technical support to the Administrator).
  - b) providers of legal, accounting and advisory services providing the Administrator with accounting, legal or advisory support,
  - c) entities authorized to receive personal data on the basis of legal provisions, e.g. courts, state authorities.

### IV. COOKIES

12. Cookies are small text information in the form of text files, sent by the server and saved on the side of the website visitor (e.g. on the hard disk of a computer, laptop, or on a smartphone memory card – depending on which device is used by the Website User).
13. The Administrator may process the data contained in Cookies when User using the Website for the following purposes:
  - a) adjusting the content of the Website to the Individual Preferences of the User (e.g. regarding colors, font size, page layout) and optimizing the use of the Website;
  - b) keeping anonymous statistics showing the manner of using the Website;
  - c) remarketing, i.e. the study of the characteristics of the behavior of Website visitors through anonymous analysis of their activities (e.g. repeated visits to specific pages, keywords, etc.) in order to create their profile and provide them with advertisements tailored to their expected interests, also when

they visit other websites in the advertising network of Google Inc. ("Google Inc."). and Facebook Ireland Ltd.;

14. The Administrator informs the User that it is possible to configure the web browser in such a way that it will prevent the storage of cookies on the User's end device. In such a situation, the use of the Website by the User may be difficult.
15. The Administrator indicates that cookies may be deleted by the User after they have been saved by the Administrator, through appropriate functions of the web browser, programs used for this purpose or using appropriate tools available within the operating system used by the User.

## V. OTHER TECHNOLOGIES

### 16. Google Analytics

The website uses the Google Analytics tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The Administrator carries out activities in this area based on a legitimate interest (Article 6(1)(F) of the GDPR), consisting in the creation of statistics and their analysis in order to optimize websites. Information about your use of the Service is automatically collected by Google Analytics and stored on a Google server in the United States. The User's IP address is shortened before being forwarded. In certain situations, your full IP address is transmitted to a Google server in the USA and shortened there. Anonymized IP address provided by the User's browser within the framework of Google Analytics, as a rule, it is not combined with other Google data. Google LLC with its registered office in the USA, using the technical infrastructure located in the USA, ensures an adequate level of protection of processed personal data accepted by the European Commission. The User may prevent the recording of the data collected by the cookies regarding the User's use of the Website by Google, as well as the processing of this data by Google, by installing a browser plug-in located at the following address: <https://tools.google.com/dlpage/gaoptout>. Details of data processing within the google analytics service are available <https://support.google.com/analytics/answer/6004245>.

### 17. Google Ads

The website uses Google Ads marketing tools provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Thanks to Google Ads, the Website is promoted in search results and on third-party websites. Activities in this extent, the Administrator implements based on the legitimate interest (Article 6 (1) (f) of the GDPR), which is the marketing of own products or services. When visiting the Website, Google Ads automatically saves a remarketing file on the User's device cookies, which enable the display of advertisements based on the User's interests. Further data processing takes place when the User has consented to Google to link the history of browsing and use of the application to the User's account, and using information from your Google Account to personalize the ads that are displayed on websites. If User is logged in to his Google Account when viewing the Pages of the Service, Google will use User's data together with Google Analytics data to create and define lists of target groups for cross-device remarketing. For this purpose, Google temporarily combines User's data with Google Analytics data to create target groups. Google LLC with its registered office in the USA, using the technical infrastructure located

in the USA, ensures an adequate level of protection of processed personal data accepted by the European Commission. You can deactivate cookies used for remarketing within your Google account settings. Details of data processing within the service Google Ads is available at: <https://policies.google.com/privacy>.

18. Google Tag Manager

The Service uses the Google Tag Manager tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. With the help of Google Tag Manager, the Administrator controls the conduct of advertising campaigns and the manner in which the User uses websites belonging to the Website. Activities in this respect are carried out by the Administrator based on a legitimate interest (Article 6(1)(f) GDPR) which is the marketing of own products or services and optimization of the Website's websites. When visiting the Website, a file is automatically saved on the User's device Google cookies, which with the help of a pseudonymous identifier (ID) and based on the history of visited pages allows the display of interest-based advertising, controlling the effectiveness of these advertisements and other activities related to the control of the User's behavior on the site. Google LLC with its registered office in the USA using the technical infrastructure located in the USA, ensures an adequate level of protection of processed personal data accepted by the European Commission. The user may deactivate cookies used for remarketing as part of the Google Account settings. Details of data processing within the Google Tag Manager service are available at: <https://policies.google.com/privacy>.

19. Facebook pixel

The Administrator uses the Facebook Pixel service provided by Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland). Thanks to the Facebook Pixel tool, the Administrator can measure the effectiveness of their ads and adapt ads to a given User. The legal basis for the above actions is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR). The Facebook pixel automatically collects information about User's use of Service, and then transfers this data to its servers in the EU or in the United States and stores it there. Based on the collected information, the Administrator is not able to identify a given Website User. Collected data, they only allow to determine what actions the User has taken on the websites. Detailed information about how the Facebook Pixel works can be found at the following web address:

[https://www.facebook.com/business/help/742478679120153?helpref=page\\_content](https://www.facebook.com/business/help/742478679120153?helpref=page_content) User can manage the performance of the Facebook Pixel through the settings of ads in his Facebook account:

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen).

For more detailed information about the processing of data by Facebook, please refer to their Privacy Policy available at:

<https://www.facebook.com/privacy/explanation>. Facebook Ireland Limited ensures an adequate level of protection of processed personal data accepted by the European Commission.

20. Social Media Tools

Plugins of the following social networks are used on the Website pages: Facebook, Google, Youtube, Linkedin, Twitter. Plugins for social networks are interactive elements on the Website, enabling sharing of content from the Website in social media and allowing for direct redirection of the User visiting the Website to the company's social profiles. When the User clicks on a given plug-in, a direct connection is established to the server of the respective social network and he

can then collect information and use cookies. If the User is logged in to his own account in a given social network, this portal may assign the User's visit to the Website to the User's account on the portal. Information on the purpose of data collection, the scope of data collected, their further processing and use by individual social networks, and the related rights of Users and possible settings to protect privacy are given in the privacy policies of individual social networks.

- Facebook - [https://www.facebook.com/legal/FB\\_Work\\_Privacy](https://www.facebook.com/legal/FB_Work_Privacy)
- Google - <https://policies.google.com/privacy?hl=pl>
- YouTube - <https://policies.google.com/privacy?hl=pl>
- Twitter - <https://twitter.com/en/privacy>
- LinkedIn - <https://www.linkedin.com/legal/privacy-policy>

If the User who has a profile in one of the social networks does not want the operator of a given portal to collect data via the Website and combine it with other saved data, he should log out of the given portal before visiting the Website and possibly delete the corresponding cookies.

## VI. SERVER LOGS

Using the Website involves sending queries to the server on which it is stored. Each query addressed to the server is saved in the server logs. Logs include, among others: IP address, server date and time, web browser and system information operational use by the User. The collected logs are stored for an indefinite period of time as an auxiliary material used to administer the Website. The information contained therein is not disclosed to anyone except persons authorized to administer the company's servers and network. On the basis of log files, statistics can be generated to help in the administration and management of the website. Aggregate summaries in the form of such statistics do not contain any identifying Website Users.