



PRIVACY POLICY

1. This privacy policy („Privacy Policy” or “Politics of Privacy”) was adopted by the company Złote Tarasy Warsaw III S.á rl . a partnership with its registered office in Warsaw (address: ul. Złota 59, 00-120 Warsaw), entered ± the register of entrepreneurs kept by the District Court. st. Warsaw in Warsaw, XII Commercial Department of National Court Register, under KRS number 0000592497, NIP: 526-225-51-69, REGON: 013278202 (, ZT ,) in connection with introduction of the new Regulation (EU) 2016/679 of the European Parliament and of European Council on April 27 2016, about the protection of individuals with regard to the processing of personal data and the free movement of such data and the repeal of Directive 95/46 / EC (General Data Protection Regulation) („ RODO „).
2. The policy states that the processing of personal data by ZT in connection with the operation of the Złote Tarasy Shopping Center , ul. Złota 59, 00-120 Warsaw („ CH Złote Tarasy „) .
3. The Policy also encompasses the use of internet sites by ZT („Service”).

I. WEBSITE REGULATIONS

1.1 TERMS OF USE OF THE WEBSITE

1. The use of the Website requires the following technical conditions:
 - a) Access to the Internet,
 - b) Operating system: Windows 7 or newer, IOS version 11 or newer,
 - c) Internet browser: Google Chrome, Mozilla Firefox , Opera, Safari ,
2. The use of the Website constitutes acceptance of this Policy P rywatności.

1.2 COOKIES

1. ZT collects information about Website users using cookies . Cookies are not used to identify individual users.
2. Cookies are set at the „entrance” and „exit” from the Service.
3. An entity placing cookie files on the user’s device,as stipulated in art. 173 par. 1 of the Act of 16 July 2004 - Telecommunications Law, is ZT.
4. The placement of cookies takes place in accordance with the relevant legal provisions, in particular with the Telecommunications Law and the Act on the provision of electronic services.
5. Cookies can be used to:
 - a.) Adjust the content of the Website to the user’s preferences and optimizing the use of the Website; in particular, these files allow recognition of the Website user’s device and as well as allowing proper display of the website, tailored to his/hers individual needs,
 - b) Website optimization, through the maximum individualization of content displayed for a given Website user,
 - c) Create statistics that help to understand how the Website users use websites, which allows improving their structure and content,
 - d) Maintaining the Website user’s session, thanks to which the user does not have to re-enter the entered data on each sub-page of the Website,
 - e) In order to optimize advertising and marketing to the individual user Service, both ZT and its business partners (and the brand owner or service provider available in the CH Złote Tarasy).



6. Adjusting commercial information, messages and content of the Website addressed to the Website users does not cause any legal, financial or other significant consequences for Website users.

7. The administrator may disclose anonymous aggregate listings and statistical summaries on, for example, the number of people visiting the Website. However, this data does not allow identification of individual users and is not classified as personal data.

8. Cookies do not damage the system of the end device the user uses, nor does it affect the method of operation of this device. Cookies do not cause any changes in the configuration of the end user devices and have no effect on the operation of the software installed on these devices.

9. Available web browsers accept cookies in the initial settings. However, the user may object to the placement of cookies on his end device by using the option to disable the cookie mechanism in a given internet browser, both on computers, smartphones and other devices. Detailed information about the possibilities and ways of handling cookies are available in the software (web browser) settings.

1.3 COMPLAINTS

1. Complaints about the operation of the Website can be reported by contacting ZT at the Złote Tarasy Shopping Center, ul. Złota 59, 00-120 Warsaw or at the e-mail address: info@zlotetarasy.pl.

2. The complaint should contain a description of the problem constituting the basis of the complaint, user's request and contact details (e-mail address) enabling contact with the user.

3. ZT recognizes to complaints within 14 days of receiving them by providing a reply to the e-mail address provided by the user.

II. RULES FOR THE PROCESSING OF PERSONAL DATA

2.1 INFORMATION ON THE ADMINISTRATION OF DATA AND CATEGORIES OF PEOPLE WHOSE DATA IS PROCESSED BY ZT

1. ZT processes personal data of persons referred to in this item, in accordance with the applicable provisions on the protection of personal data and is their administrator within the meaning of these provisions.

2. ZT, in connection with the operation of CH Złote Tarasy, may process personal data of the following categories of persons:

- a.) Consumers
- b) Tenants who are natural persons,
- c) Contractors being natural persons,
- d) Employees of tenants and contractors,
- e) Employees of subcontractors of tenants and contractors.

3. In the case of consumers, ZT processes personal data in particular:

- a) Participants of competitions and marketing campaigns,
- b) Subscribers to the newsletters from CH Złote Tarasy,
- c) People using the consultancy service with the stylist „Personal Style Dimensions”,
- d) Users of the mobile application,
- e) Contacts of ZT information point
- f) Persons submitting claims in relation to ZT,
- g) Users of social media,



- h) People visiting CH Złote Tarasy,
- i) People using the car park (in the subscription and hourly system) .

4. ZT provides detailed, legally required information regarding the processing of personal data to the persons referred to in paragraph 2.b) and 2.c) and par. 3.a) - 3.f) above directly when obtaining data, i.e. in the case of:

- a) Tenants who are natural persons - simultaneously with the signing of a lease agreement,
- b) Contractors who are natural persons - simultaneously with signing the contract,
- c) Participants of competitions and marketing campaigns - simultaneously with sending confirmation of participation,
- d) Subscribers to the newsletter from CH Złote Tarasy - simultaneously with the confirmation of subscribing to the Newsletter,
- e) People using the consultancy service with the stylist „Personal dimensions of style” - simultaneously with sending confirmation of registration for consultations,
- f) Users of the mobile application - simultaneously with downloading the application by the user,
- g) Contacts of ZT information point - simultaneously with the adoption of the report and the in,
- h) Persons submitting claims in relation to ZT - simultaneously with responding to the application .

5. In addition, detailed information on the processing of personal data is required by law social media users, ZT makes available to these users through publication on the CH Złote Tarasy profile in these media outlets.

6. Detailed , legally required information regarding the processing of personal data, persons other than those indicated in paragraph 4 and 5 above, have been presented in 2.2 of this Policy.

2.2 THE SCOPE, GOALS AND METHOD OF PROCESSING PERSONAL DATA OF CERTAIN CATEGORIES OF PEOPLE

1. People visiting CH Złote Tarasy

ZT processes personal data, i.e. the image of persons visiting CH Złote Tarasy in order to ensure safety and order in the Złote Tarasy Shopping Center, in connection with video surveillance of CCTV. This data may also be used in connection with legal violations committed by persons visiting CH Złote Tarasy. In such a situation, the personal data of persons visiting CH Złote Tarasy are processed in order to implement the legitimate interests of TS, i.e. to ensure security and order in the Złote Tarasy CH and to claim redress.

Considering the above objectives, ZT may share personal data of persons visiting CH Złote Tarasy to technical or organizational service providers as well as legal and consulting services, which ZT uses in connection with running CH Złote Tarasy, i.e. in particular the facility manager, security company and CCTV system provider, law and tax offices, courier and postal companies. Personal data may also be made available to public authorities, including the police and other security services.

ZT does not transfer personal data to third countries (outside the EEA).

The processing of personal data of persons visiting CH Złote Tarasy does not include automatic decision making or profiling.

Personal data recorded on recordings from CCTV monitoring are stored for 30 days. In the case of proceedings related to violations of law, which are made by visitors to CH Złote Tarasy, personal data may be kept longer - for the duration of these proceedings and until the expiry of the period of limitation of claims.



2. Persons using the car park (in the subscription and hourly system)

ZT processes personal data of people using the parking lot for the following purposes:

- a) Implementation of a short-term lease agreement for a parking space,
- b) Claims in the event of damage or failure to pay for parking,
- c) Statistics.

In these situations, the basis for the processing of personal data of persons using the car park in an hourly system is the act of a lease agreement to which the person is a party (refer to point a) above) and pursuit of legitimate interests of TS in the scope of the objectives referred to in point a), b) and c) above.

Providing data for the purpose mentioned in point. a) is a contractual condition, and its absence may prevent ZT from performing the contract. In other cases, the basis for data processing is the implementation of the legitimate interest of ZT.

Data on persons using the car park acquired by ZT for statistical purposes are collected by using the system of automatic recognition of license plates. The collection of this data does not cause any legal, financial or other significant consequences for those using the car park.

Considering the above objectives, ZT may share personal data of persons using the parking lot with technical or organizational service providers as well as legal and advisory services, which ZT uses in connection with running CH Złote Tarasy, i.e. in particular the facility manager, parking lot manager, security company, law and tax offices, courier and postal companies. Personal data may also be made available to public authorities, including the police and other security services.

ZT does not transfer personal data to third countries (outside the EEA).

The processing of personal data of persons using the car park does not include automatic decision making or profiling.

Data on persons using the car park are stored for 90 days. In the case of persons using the parking in the subscription system, personal data is processed for the duration of the subscription contract and for 5 years from its expiration.

In the event of proceedings related to violations of law, which are made by persons using the car park, data may be stored for longer - for the duration of these proceedings and until the expiry of the period of limitation of claims.

For persons using the car park in the subscription system, ZT provides the required information also directly when acquiring data, i.e. simultaneously with signing a subscription contract.

3. Employees of tenants and contractors ZT

ZT processes personal data of employees of its tenants and contractors for the following purposes:

- a) Performing concluded contracts,
- b) Ensure order and security (concerns the notification of works, issuing access cards),
- c) Claim or defend rights.

In these situations, the basis for the processing of personal data of employees of tenants and contractors is the implementation of the legitimate interests of ZT.

ZT acquires personal data of the above-mentioned persons from tenants and contractors in connection with the implementation of contracts. The personal data provided may include personal data (name, surname), contact details (phone number, e-mail address) and data regarding the occupational position. Considering the above objectives, ZT may share personal data of employees of tenants and contractors



with technical or organizational service providers as well as legal and advisory services, which ZT uses in connection with running CH Złote Tarasy, i.e. in particular the facility manager, security company, law and tax offices, courier and postal companies.

ZT does not transfer personal data to third countries (outside the EEA).

The processing of personal data of employees of tenants and contractors of TS does not include automatic decision making or profiling.

The personal data of employees of tenants and contractors are processed for the duration of binding contracts with ZT and for 5 years from their expiration. The data contained in the notification forms are stored for the same period. When conducting court proceedings in connection with pursuing claims or defending rights, personal data is kept for the duration of these proceedings and until the expiry of the period of limitation of claims.

4. Employees of subcontractors of tenants and contractors ZT

ZT processes personal data of subcontractors (who are natural persons) of tenants and contractors and employees of subcontractors of tenants and contractors for the following purposes:

- a) Ensure order and security (notifications concerning work, issuing access cards),
- b) Claim or defend rights.

In these situations, the basis for the processing of personal data of the above-mentioned persons is the implementation of the legitimate interests of ZT.

ZT acquires personal data of the above-mentioned persons from tenants and contractors, in connection with the consultations of work carried out at premises or at the Złote Tarasy Shopping Center. The personal data provided may include personal data (name, surname), contact details (phone number, e-mail address) and data regarding the occupational position.

Considering the above objectives, ZT may share personal data of persons indicated above to technical or organizational service providers as well as legal and advisory services, which ZT uses in connection with running CH Złote Tarasy, i.e. in particular the facility manager, security company, law and tax offices, courier and postal companies.

ZT does not transfer personal data to third countries (outside the EEA).

The processing of personal data of the persons concerned does not include automatic decision making or profiling.

Personal data of the persons in question are processed for 5 years from the completion of work carried out at the premises or at the Złote Tarasy Shopping Center. When conducting court proceedings in connection with pursuing claims or defending rights, personal data is kept for the duration of these proceedings and until the expiry of the period of limitation of claims.

2.3 RESPONDING TO REQUESTS OF DATA SUBJECTS

1. In connection with the operation of CH Złote Tarasy, ZT provides all persons whose data is processed (indicated in point 2.1), exercising their rights in accordance with applicable laws. These people have the right:

- a) Access to their personal data,
- b) Request immediate correction of personal data,
- c) Request the immediate deletion of personal data,
- d) Requests to limit the processing of personal data,



e) Data transfer,

f) Express objection to the processing of her personal data, including profiling.

2. Detailed information on the method of implementation of the above powers, see section 2.4 of this Policy.

3. In addition, in the case of processing personal data on the basis of consent, the person to whom the data relates ZT provides the person the opportunity to withdraw consent at any time. The withdrawal of consent does not affect the legality of the processing which was carried out on the basis of consent before it is withdrawn.

4. Persons whose data is processed by ZT may fulfill their entitlements referred to in paragraph 1 and 3 above, contact with ZT at the address: Centrum Handlowe Złote Tarasy, ul. Złota 59, 00-120 Warszawa or by e-mail: daneosobowe@zlotetarasy.pl.

5. ZT without undue delay - and in any case within one month of receiving the request - provides the data subject with information on actions taken in connection with the exercise of the rights referred to in paragraph. 1 and 3 above.

6. If ZT does not take action in relationship with the request of the data subject, it is immediately - at the latest in within one month of receipt of the request - ZT informs the data subject about reasons for not taking action and about the possibility of lodging a complaint to the supervisory authority and making use of legal protection measures before a court.

7. At the same time, every person who believes that their data is processed unlawfully by ZT has the right to lodge a complaint with the supervisory authority: the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw.

2.4 RIGHTS OF PERSONS WHOSE DATA ARE PROCESSED BY ZT

1. The right to access data

A person whose data is processed by ZT may request information whether his personal data are processed and, if so, access to them.

ZT, at the request of persons regarding access to its data, informs the person about the scope, manner and purpose of data processing, and also grants the person access to data concerning said person.

Access to data can be made by issuing a copy of the data, with the first copy of the data being provided free of charge. In the event of requesting further copies of data, ZT is entitled to collect a fee in the amount corresponding to the administrative costs.

2. The right to rectify data

In the event that personal data is out of date or incorrect, the data subject may request their rectification. In the event that the data has been made available to other entities, ZT informs these entities that the data has been corrected. In addition, ZT supplements and updates data at the request of the data subject. ZT may refuse to supplement the data if it is unnecessary for processing purposes.

3. The right to delete data („the right to be forgotten”)

At the request of the data subject, ZT removes the collected data . It is possible if:

a) Data is no longer necessary for the purposes in which it has been collected or in another way processed,

b) The data subject has withdrawn from the agreement on which the processing is based and there is no other legal basis for processing,



c) The data subject has objections to the processing and there are no overriding legitimate grounds for processing,

d) Personal data has been processed contrary to the law,

e) Personal data must be removed in order to comply with legal obligation imposed on ZT

f) Personal data has been collected in relationship with offering social services to a child

If the data subject to removal has been made available to other entities, ZT takes reasonable steps, including technical measures, to inform these entities of the need to delete and access data. At the request of the data subject, ZT informs it about the entities to which its data has been made available.

4. The right to limit processing

ZT limits the processing of data at the request of the data subject in a situation where:

a) The data subject questions the correctness of personal data - for the period allowing ZT to check the correctness of such data,

b) Processing is incompatible with rights, and the data subject opposes the removal of personal data by requesting in exchange restrictions on their use,

c) ZT no longer needs personal data for processing, but it is needed by the data subject to determine, assert or defend claims,

d) The data subject has objected to the processing - until it is established whether the legitimate grounds on the part of ZT override the grounds for objection of the data subject.

If the data processing has been limited, ZT processes it only for the purposes for storing it, only with the consent of the data subject, or to establish, investigate or defend claims, or in order to protect the rights of another natural or legal person, or due to the attention to important reasons of public interest.

5. The right to transfer data

If the data is processed on the basis of consent or to conclude a contract, ZT at the request of the person issues its data concerning it, processed in information systems, in a structured, commonly used machine-readable format or transmits them - if it is possible - to another entity .

6. The right to object to the processing of her personal data, including profiling

If the data subject complains about its special situation, he has to object to the processing of their data, and the data is processed by ZT based on the legitimate interest of ZT , ZT takes into account the opposition, unless ZT has important, legitimate grounds for processing, it overrides the interests, rights and freedoms of the person objecting, or for the basis for determining, an investigation and defense of claims.

In the case of objections to the processing of data for direct marketing purposes (including profiling), ZT takes the action immediately and stops processing the data of the person who raised the objection.

III. FINAL PROVISIONS

1. The Privacy Policy does not apply to other websites and entities whose contact details are provided on the Website. If the Website contains links to other websites, ZT state that it is not responsible for the privacy policy applied by the owners of these domains and websites. The Privacy Policy does not apply to services provided by other entities via or through the use of the Website, if such services are provided by third parties.

2. This Privacy Policy comes into effect from May 25, 2018.

3. ZT is entitled to change this Privacy Policy at any time. The introduced changes are effective from the moment they are published on the Website.