# **Privacy Policy of ATM Virtual**

This Privacy Policy outlines the principles for the use of cookies and the processing of personal data collected when using our website available at <a href="https://www.atmvirtual.pl">https://www.atmvirtual.pl</a> or our social media profiles.

The term **"User"** shall be understood as any person who uses the Internet to access websites that use cookies.

## 1. Personal data controller

The controller of your personal data is **ATM Virtual Sp. z o.o.**, with its registered office in **Warsaw, ul. Wał Miedzeszyński 384, 03-994 Warszawa**, Poland.

For any matters related to the processing of personal data, you can contact us by email at: kontakt@atmvirtual.pl

# 2. Purpose and legal basis for data processing

We use cookies to ensure that our website functions correctly, to facilitate navigation, to present our activities and services, and for statistical and marketing purposes.

We also operate social media profiles to promote our brand and productions, communicate with users, and gather statistical data.

The processing of data related to the administration of our website and social media profiles is based on the **User's consent** (Article 6(1)(a) of the GDPR), where applicable, or on our **legitimate interest** (Article 6(1)(f) of the GDPR). More information about the legal basis for processing is provided below in the description of the IT tools we use.

## 3. Period of data retention

We process your data until you withdraw your consent or object to the processing.

## 4. Information on cookies used

#### What are cookies?

Cookies are small data files, usually text files, sent by a server and stored on the User's device. They allow the website to recognise the User's device and correctly display its content according to the User's preferences.

## What do we use cookies for?

Cookies are used to:

- adjust the website content to User preferences,
- optimise navigation and improve website functionality,
- analyse traffic and generate statistics to improve the website's structure and content,

- ensure security,
- deliver advertising content and multimedia.

Cookies may also be used by our partners and service providers.

## Types of cookies used

We use both **session cookies** (which are deleted after the browser is closed) and **persistent cookies** (which remain on the User's device for a specified period or until manually deleted).

#### Data collection

Like most websites, we store server logs containing information such as:

- IP address,
- browser type,
- URL of the visited page,
- referrer link,
- date and time of access,
- error codes and session data.

This information is not used to identify specific Users.

#### Use of data

Logs are stored for administrative and statistical purposes. Access is limited to authorised personnel.

## **Deleting and disabling cookies**

You can disable cookies or change cookie settings in your browser. Instructions for major browsers (Google Chrome, Firefox, Microsoft Edge, Opera) are available in their "Help" sections. Please note that disabling cookies may affect some website functions.

## Links to other websites

Our website may contain links to external websites. We are not responsible for the privacy practices of third-party websites; we recommend reviewing their Privacy Policies.

#### **Google Analytics**

Our website uses Google Analytics (GA) and Google Analytics 4 (GA4), provided by **Google Ireland Limited**. These tools use cookies to gather information about website usage. Data may be transferred to Google servers in the USA, but IP anonymisation is applied for Users from the EU/EEA. The data helps us analyse traffic and improve our services, based on our legitimate interest (Article 6(1)(f) GDPR).

## Social media (Facebook, Instagram, LinkedIn)

When a User interacts with our profiles (e.g. comments, likes, shares), we gain access to their publicly available data. Such interactions imply consent to data processing under the general terms of the respective social platforms.

#### YouTube

Our website may include embedded YouTube videos. YouTube uses cookies to store the preferences of Users watching videos. Data processing is based on our legitimate interest (Article 6(1)(f) GDPR).

## 5. Data recipients

Users' personal data may be disclosed to:

- authorised employees and associates of ATM Virtual,
- IT, analytical, and marketing service providers,
- entities legally entitled to receive data.

All partners are required to ensure compliance with GDPR and implement adequate data protection measures.

# 6. Rights of data subjects

Users have the following rights under the GDPR:

- access to their data,
- rectification of inaccurate data,
- erasure of data ("right to be forgotten"),
- restriction of processing,
- data portability,
- objection to processing based on legitimate interest,
- withdrawal of consent (without affecting prior lawful processing).

If you believe your personal data is processed unlawfully, you may lodge a complaint with the **President of the Personal Data Protection Office** (UODO).

# 7. Automated decision-making

Your personal data will not be subject to automated decision-making, including profiling.

## 8. Provision of data

Providing personal data is voluntary, but necessary to use some features of the website or communicate with us via forms or social media.