**PRIVACY POLICY FOR USERS OF “MYMENU.PL” AND “PLANER.MYMENU.PL” WEBSITES**

Dear Sir or Madame,

Constantly striving to ensure the best protection of personal data, we would like to assure you that we protect your personal data at the highest level and in this document you will find all information on what personal data we process in connection with your use of the websites: www.mymenu .pl and planer.mymenu.pl (hereinafter collectively: **"Service"**) and for what purpose.

1. **CONTROLLER OF PERSONAL DATA AND CONTACT INFORMATION**

The Controller of personal data is **MyMenu spółka z ograniczoną odpowiedzialnością** with its registered seat in Warsaw, hereinafter referred to also as **“Company”**.

If you have any questions or comments about our Website and data processing, please contact us:

* + at mailing address: Warszawa (00-640), ul. Mokotowska 1, VIII p.
  + at email address: [iza@mymenu.pl](mailto:iza@mymenu.pl)

Requests for rectification or deletion of personal data should be sent to us at the following address: [iza@mymenu.pl](mailto:iza@mymenu.pl).

1. **DATA PROTECTION OFFICER**

The Data Controller has appointed a Data Protection Officer who can be contacted at the above-mentioned e-mail address or at the mailing address, with a note "DPO".

1. **WHAT DATA DO WE COLLECT AND FOR WHAT PURPOSE?**

The scope and purpose of our data collection depends on User’s activity on the Website.

1. **Creating an account on the Website**

In case of creating an account on the Websites, the User is asked to provide the necessary data to create and maintain the account, i.e., provide an e-mail address and a password.

The personal data are processed:

* + - in order to provide services related to the maintenance and operation of the account on the Website - the legal basis for the processing is the **indispensability of the processing to perform the contract**;
    - for the purpose of possible establishment, investigation or defence against claims - the legal basis of the processing is the **legitimate interest**, consisting in protection of our rights;

1. **Newsletter**

For Users who have provided us with their e-mail address for this purpose on **planer.mymenu.pl** website, we provide newsletter services, i.e., the provision of commercial information on products or services offered by us. Providing this data is voluntary yet indispensable to receive the newsletter.

The personal data are processed:

* in case of sending marketing contents to the User within the newsletter - the legal basis of processing is the **legitimate interest,**
* for the purpose of possible establishment, investigation or defence against claims - the legal basis of the processing is the **legitimate interest** consisting in protection of our rights.

1. **Contact via contact form**

If you wish to contact us via contact form the Controller may require providing personal data only in case it is necessary for answering User’s question. The legal basis of the processing is the **legitimate interest** consisting in necessity to resolve a reported matter related to the Website or our offer.

1. **Data of social media profiles users**

The Controller has social media profiles such as Facebook and Instagram. Our profiles on these websites are public. A User who visits our profile provides us with his personal data (e.g. account name, comments, likes, internet identifiers and the IP address of the device he is using).

These data are processed in order to: (i) enable us to effectively run our profile in connection with the promotion of various types of events, services and products by us, and (ii) communicate with users. The legal basis for the processing of personal data is our **legitimate interest**, consisting in promoting our brand, improving the quality of our services as well as ongoing communication with fanpage users. We also process data for the purpose of pursuing claims and defending against claims.

**NOTE**: the above information does not apply to the processing of your personal data by the administrator of Facebook or Instagram.

1. **HOW LONG DOES COMPANY PROCESS YOUR PERSONAL DATA FOR?**

The processing period depends on the type of service provided and the purpose of the processing. As a general rule, data are processed:

- for the period necessary for fulfillment of the contract;

- until you lodge an effective objection.

The processing period may be extended if the processing is necessary for the establishment, investigation or defence against possible claims, and thereafter, only if and to the extent required by law.

1. **WHAT RIGHTS DO USERS HAVE WITH RESPECT TO THEIR PERSONAL DATA?**

We guarantee the exercise of all data subjects’ rights, including the right:

* + to access the data, including the right to obtain copies;
  + to delete the data;
  + to transfer the data;
  + to rectify the data;
  + to limit the processing;
  + to lodge an objection;
  + to lodge a complaint with the President of the Office for the Protection of Personal Data;

**IF YOU WISH TO EXERCISE YOUR RIGHTS, PLEASE CONTACT US FIRST.**

1. **WITH WHOM DO WE SHARE THE PERSONAL DATA YOU GIVE US?**

Personal data **on the basis of an appropriate agreements** may be transferred to the processors acting on the behalf of the Company, including but not limited to IT service or Website maintenance providers. Such processors shall only process data in accordance with our instructions and in a confidential and secure manner. We have the right to control how the data entrusted by you are processed.

In other cases, personal data may be disclosed to entities authorized solely **on the basis of provisions of law**.

1. **TRANSFER OF DATA OUTSIDE THE EEA AREA**

The controller transfers personal data outside the EEA as part of the use of the services of Google Analytics on **mymenu.pl** website and of such subcontractors as Google Analytics, Hotjar, Amplitude, Inc, GetVero, Segment, Inspectlet on **planer.mymenu.pl** website. We make every effort to ensure an adequate level of protection of personal data, after careful consideration of the data security offered by sub-suppliers, and the transfer of data takes place on the basis of standard contractual clauses approved by the European Commission or on the basis of appropriate decisions issued by the European Commission in relation to a given third country.

1. **SOCIAL MEDIA**

The Website uses plugins and other social tools provided by social networking sites such as Facebook and Instagram.

In connection with the use of the Website that contains such a plug, the User's browser establishes a direct connection with the servers of social network administrators (service providers). The content of the plugin is transferred by the given service provider directly to the User's browser and integrated with the website. Thanks to this integration, service providers receive information that the User's browser has displayed the Website, even if the User does not have a profile with a given service provider or is not logged in at the moment. Such information (along with the IP address) is sent by the User's browser directly to the server of a given service provider (**some servers are located in the USA**) and stored there.

If the User has logged in to one of the social networking sites, the service provider will be able to directly assign the visit to the Website to the User's profile on the given social networking site. If the User uses a given plug-in, ex. "Like" button, the relevant information will also be sent directly to the server of the given service provider and stored there. In addition, this information will be published on a given social network and will appear to people added as User's contacts.

The purpose and scope of data collection and their further processing and use by service providers, as well as the possibility of contact and the User's rights in this regard and the possibility of making settings ensuring the protection of Users' privacy are described in the privacy policy of individual service providers.

Facebook - https://www.facebook.com/privacy/explanation

Instagram - https://help.instagram.com/519522125107875

If the User does not want social networking sites to assign data collected during visits to the Website directly to his profile on a given website, it is necessary to log out of this website before visiting the Website. It is also possible to completely prevent the loading of plugins on the website by using appropriate extensions for the User's browser, e.g. blocking scripts.

1. **OUR PARTNERS' TOOLS**

We also rely on third-party services and tools to provide our services and to improve and analyse them. These parties pursue only the purposes we have specified. Below you can find information about our partners and the tools they use.

* 1. **Google Analytics**

We use the Google Analytics tool provided by Google Ireland Limited (**“Google”**) based in Ireland. We use cookies to collect and analyse information such as the number of visits to our Websites, the effectiveness of our marketing campaigns and the time spent on our Websites. We only use this information to improve the quality of the Website.

1. **Hotjar**

We use Hotjar tool which monitors and saves activities of Website Users. This tool registers such data as: navigation, scrolling, cursor movements. It also collects data on localization, device in use, operating system, browser and cookies. More information on privacy policy of Hotjar tool is available under: <https://www.hotjar.com/privacy>.

1. **Amplitude**

On the Website, the Company uses the Amplitude tool, which is a digital optimization system, in order to compile statistics on the volume of traffic on the Website and the manner of using the Website. For more information on Amplitude's privacy policy, please visit: <https://amplitude.com/privacy>.

1. **GetVero**

On the Website, the Company uses GetVero tool, which is a software enabling collection of user and usage data and enabling Collector sending e-mail messages efficiently to users based on their behavior. For more information on GetVero’s privacy policy, please visit: <https://www.getvero.com/privacy/>.

1. **Segment**

On the Website the Company uses Segment tool which collects events from Website and provides a complete data toolkit to the Controller. For more information on Segment’s privacy policy, please visit: <https://segment.com/legal/website-data-collection-policy/>.

1. **Inspectlet**

On the Website the Company uses Inspectlet tool which registers user’s behavior on the Website enabling preview of all actions therein including mouse movements, scrolling, clicks, keypress on Website. For more information on Inspectlet’s privacy policy, please visit: <https://www.inspectlet.com/terms-of-service#privacy>.

1. **COOKIES POLICY**

The website uses the so-called cookies. These are small text files placed on your devices (e.g. computers) via web browsers. These files allow specific information to be stored on the device and then read by the service that created the files. Cookies usually contain, apart from the domain name of the website they come from, also the storage time on the end device and a unique number.

Cookies are transferred to web browsers and then stored in the device memory and read by the server each time you connect to the Website.

Cookies do not contain any information enabling third parties to learn about your personal data or to contact you via e.g. e-mail or telephone. We also point out that saving cookies does not allow the Service Provider or third parties to access your private device.

What kind of cookies do we process?

**Technical cookies**

They enable the correct use of message transmission and the storage of your settings.

Name: MyMenuSID

Expires: after the end of the browser session

Description: Standard session cookie representing visits to a page in a given web browser.

**Name: cookies**

Expires: one year

Description: cookie saves information that the user has consented / accepts the use of cookies by the website.

**Other cookies**

We use Google Analytics, Amplitude and Hotjar. These are platforms for researching User behavior on the Website. We use these tools to know, for example, which tabs on the Website are the most interesting, how much time on average Users spend on the website, from which pages they go to the Website. These cookies help us improve the Website.

**Changing cookie settings**

Usually, the web browser allows cookies to be stored on the end device by default. However, you have the option and the right to change your cookie settings at any time. To change cookie settings, you should read the detailed information about the possibilities and methods of handling cookies, which are available in the web browser settings.

If you do not agree to the placement of cookies on your device, you can **block** their placement **by properly configuring your web browser**. Information on how to do this can be found in the help files of your web browser. If cookies from the Website are blocked, the Administrator cannot guarantee its correct operation. If you do not change the cookie settings, these files will be stored on the end device. This means that the Administrator will store information on the end device and access this information.

1. **SECURITY**

● The website, registration and account login panel is encrypted with a 256-bit SSL key.

● Logging in to the account is possible only after entering the password. It is recommended to change the password at least every 30 days, at least every 90 days.

● It is not recommended to set the browser to remember the password.

● It is not recommended to use public WiFi networks.

● It is not recommended to use devices that do not belong to the User or are shared with third parties.

1. **CHANGES TO THE PRIVACY POLICY**

The policy is kept under review and updated as necessary. The current version of the policy was adopted and is effective as of May [\_], 2021.