

PRIVACY POLICY

§1. GENERAL PROVISIONS

1. **This Privacy Policy applies to individuals using the Website located at the URL: <https://www.lumaservices.eu>**, including the use of the Company's recruitment system.
2. The personal data controller is: **LUMA SERVICES Sp. z o. o., ul. Cieszyńska 23G, 43-170 Łaziska Górne**, e-mail: office@lumaservices.eu
3. Contact details of the Data Protection Officer: iod@lumaservices.eu

§2. PERSONAL DATA

In connection with the implementation of the requirements Regulation (EU) No. 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and on repeal of the directive 95/46/WE we inform you that:

1. We process data for the following purposes:
 - a. execution of a contract or taking steps at the request of the data subject prior to entering into a contract (legal basis: Article 6(1)(b) GDPR),
 - b. handling inquiries (Article 6(1)(b) GDPR),
 - c. handling complaints and claims (Article 6(1)(c) GDPR),
 - d. storing documentation and fulfilling legal obligations imposed on the Controller (Article 6(1)(c) GDPR),
 - e. sending newsletter (Article 6(1)(b) GDPR),
 - f. monitoring and improving the quality of services provided – requesting the completion of a survey or answering a few questions regarding the quality of services (Article 6(1)(f) GDPR),
 - g. displaying personalised commercial information on social media platforms (Article 6(1)(a) of the GDPR).
2. Providing data is voluntary, but necessary to use services. If consent is required, it is always explicitly indicated, voluntary, and usually granted by ticking a checkbox containing the terms of the consent.
3. If an individual has given consent for data processing (legal basis: Article 6(1)(a) of the GDPR), the data is processed until the consent is withdrawn. However, even after that period, information concerning who granted the consent, when, and what for may be archived (for the purpose of establishing, pursuing, or defending legal claims). In other cases, data is processed for a period justified by achieving the intended purpose (e.g., contract performance, responding to inquiries, tax regulations, etc.). The processing period depends on the ability to establish, pursue, or defend legal claims or when data retention is required by tax regulations.
4. Consent can be withdrawn at any time by sending an email to: office@lumaservices.eu
5. Each data subject has the right to access their personal data, to rectify, delete, or restrict its processing, the right to object, the right to data portability, and the right to lodge a complaint with the supervisory authority (President of the Personal Data Protection Office).
6. Transaction data, including personal data, is provided directly by the user to the payment service provider.

7. Visitors to the Website may use the contact details provided for the Company, such as email addresses and phone numbers. Establishing contact does not necessarily involve the processing of personal data. However, if data is collected, the Company becomes the data controller within the meaning of General Regulation No. 2016/679 (GDPR). An information clause regarding this matter can be found in a separate section on the website: www.lumaservices.eu.
8. Website visitors may consent to our conducting advertising campaigns on social media platforms targeted based on login data from LinkedIn, in connection with the plug-in of this social media platform installed on the website.

§3. RECIPIENTS OF DATA

We utilise the services of software development companies and those maintaining IT systems, with whom we have entered into appropriate agreements. These agreements include data processing rules and confidentiality provisions. The data is not shared, and none of these companies have the right to process the data in any way other than as specified in the agreement. If the Company has access to your data, it may be processed solely for the purpose of providing services properly.

§4.COOKIES, SOCIAL MEDIA

1. The Administrator may process data contained in Cookies during visitors' use of the website www.lumeservices.eu
2. The settings of your web browser regarding Cookies are important for granting consent to our website's use of Cookies – under applicable regulations, such consent can also be given through your browser settings. Detailed information on how to change Cookie settings and manually delete them in the most popular web browsers is available in the help section of your browser as well as on the following pages (simply click on the relevant link):
[Chrome](#)
[Firefox](#)
[Internet Explorer:](#)
[Opera](#)
[Safari](#)
[Microsoft Edge](#)
3. The Company may use services such as Google Ads, Google Analytics, Universal Analytics provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland), as well as the Hotjar service provided by Hotjar Limited (Level 2, St Julian's Business Centre, 3 Elia Zammit Street, St Julian's STJ 1000, Malta). These services assist the website Data Controller in generating statistics and analysing traffic on the website. The data collected is processed within the framework of these services to create statistics that help in website administration and traffic analysis. This data is aggregated in nature. By using the aforementioned services on the website, the Data Controller collects data such as the sources and medium of how visitors access the www.lumaservices.eu website, their behaviour on the site, information about the devices and browsers used to visit the site, IP addresses and domains, geographic data, as well as demographic data (age, gender) and interests.
4. It is possible for an individual to easily block the sharing of information about their activity on the Company website with Google Analytics. For this purpose, one can,

for example, install a browser add-on provided by Google Ireland Ltd., available here:

<https://tools.google.com/dlpage/gaoptout?hl=pl>.

5. In connection with the possibility of creating a redirection from the website to the LinkedIn social media platform, we inform you that the processing of personal data on this platform is governed by separate rules outlined in the privacy policy of that entity. We recommend reviewing these rules before starting to use the platform or clicking on the logo redirecting to the Luma Services social media profile on LinkedIn. The privacy policy is available at: <https://pl.linkedin.com/legal/privacy-policy>.