

PRIVACY POLICY AND COOKIES POLICY ON WWW.CDEX.CLOUD

GENERAL PROVISIONS

This Privacy Policy of a website available at cdex.cloud (hereinafter “the Website”) is for information purposes and does not give rise to any obligations for the Website users. The Privacy policy sets out the rules of processing personal data by the Website administrator, including the purpose and scope of such processing, the rights of data subjects and information about the use of cookie files and analytical tools.

The controller of personal data collected via the Website is CDeX PSA seated in Poznań, entered into the register of entrepreneurs of the National Court Register under no KRS 0000978218; registration court which keeps the Company’s documents: District Court (Sąd Rejonowy) in Poznań – Nowe Miasto i Wilda in Poznań, VIII Economic Division of the National Court Register; having registered and correspondence address at ul. Marcelińska 90, 60-324 Poznań, NIP (tax identification number): 7792541145, business identification number (REGON): 522442194, e-mail address: contact@cdex.cloud, phone number: +48 61 667 07 44, fax +48 61 622 95 04 (charges according to the Operator’s tariff) (hereinafter: “**CDeX**”, “**the Owner**” or “**the Administrator**”).

The Controller processes personal data on the Website in accordance with the applicable provisions of law, including but not limited to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to 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 “**the GDPR**”. The official text of the GDPR: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>

You use the Website voluntarily. Using the Website does not require from you any personal data, unless you want to use the one of the contact form available on the website – in that case you must provide your contact details (contractual requirement) in the scope specified in the Website’s Terms of Use and failure to provide the data makes it impossible to send the given contact form.

The Administrator exercises due diligence to protect the interest of data subjects, in particular the Controller is responsible for and ensures that the data it collects are: (1) processed lawfully; (2) collected for specific, lawful purposes and are not further processed in a way incompatible with those purposes; (3) adequate, relevant in relation to the purposes for which they are processed; (4) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, and (5) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Considering the nature, extent, context and purpose of the processing and the risk of infringing the rights or freedom of a natural person of varied probability and varied scale of threat, the Administrator implements adequate technical and organisational measures to process data in compliance with this regulation and be able to demonstrate it. The measures are subject to review and update if needed. The Administrator applies technical measures to protect electronically sent data from unauthorized access and modification.

CONTACT DETAILS

The Administrator’s contact details

CDeX PSA

ul. Marcelińska 90, 60-324 Poznań

e-mail: contact@cdex.cloud,

telephone: +48 61 667 07 44
 fax +48 61 622 95 04

Contact details of the personal data inspector appointed by the Administrator:

Arnold Paszta
 Correspondence address: ul. Marcelesińska 90, 60-324 Poznań
 e-mail: rodo@vectorsynergy.com

BASIS FOR THE PROCESSING

The Administrator may process personal data if and to the extent that at least one of the following applies: (1) the data subject has given consent to the processing of his or her personal data for one or more specific purposes; (2) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (3) processing is necessary for compliance with a legal obligation to which the Administrator is subject; (4) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Each processing of personal data by the Administrator requires the occurrence of at least one of the above grounds. Specific grounds for the Administrator’s processing of the personal data of Website users are indicated in the subsequent paragraph of the Privacy Policy – with reference to a given purpose of processing.

PURPOSE, BASIS DURATION AND SCOPE OF DATA PROCESSING ON THE WEBSITE

In each case the purpose, basis, duration and scope as well as the recipients of personal data processed by the Administrator depends on the user’s activity on the Website. The Administrator may process personal data on the Website for the following purposes, on the following grounds and in the following scope:

Purpose of data processing	Legal basis for the processing and retention period	Scope of data processing
<p>Reply to a question asked via contact form or DEMO form</p>	<p>Depending on the purpose of the contact</p> <ol style="list-style-type: none"> 1) Article 6(1)(b) GDPR (performance of a contract or taking steps at the request of the data subject prior to entering into a contract) or 2) Article 6(1)(f) GDPR (legitimate interests pursued by the controller) <p>The retention of data depends on the legal basis – respectively:</p> <ol style="list-style-type: none"> 1) for the period necessary to take steps at the request of the data subject prior to entering into a contract and if the contract is concluded, for the period necessary to perform the contract, until its termination or other expiry of the contract; or 2) for the duration of the legitimate interest pursued by the Administrator however no longer than for the period of limitation of the claims against the data subject with respect to the Administrator’s business activity. Periods of limitation are prescribed in the provisions of law, including but not limited to the 	<p>Contact form – maximum scope: name and surname, e-mail address.</p> <p>DEMO form – maximum scope: name, surname, e-mail address, telephone number</p>

	<p>Civil Code (the basic period of limitation of claims arising from business activity is three years).</p>	
<p>Performance of a contract</p>	<ol style="list-style-type: none"> 1) Article 6(1)(b) GDPR (performance of a contract or taking steps at the request of the data subject prior to entering into a contract) or 2) Article 6(1)(f) GDPR (legitimate interests pursued by the controller) <p>The retention of data depends on the legal basis – respectively:</p> <ol style="list-style-type: none"> 1) for the period necessary to take steps at the request of the data subject prior to entering into a contract and if the contract is concluded, for the period necessary to perform the contract, until its termination or other expiry of the contract; or 2) for the duration of the legitimate interest pursued by the Administrator however no longer than for the period of limitation of the claims against the data subject with respect to the Administrator’s business activity. Periods of limitation are prescribed in the provisions of law, including but not limited to the Civil Code (the basic period of limitation of claims arising from business activity is three years). 	<p>Data contained in the agreement concluded with CDeX</p>
<p>Responding to a recruitment application, recruitment procedure</p>	<p>Depending on the purpose of the contacting:</p> <ol style="list-style-type: none"> 1) Article 6(1)(a) GDPR (consent of the data subject), or 2) Article 6(1)(b) GDPR (performance of a contract or taking steps at the request of the data subject prior to entering into a contract) <p>The retention of data depends on the legal basis – respectively:</p> <ol style="list-style-type: none"> 1) in the case of the consent – until it is withdrawn; 2) for the period necessary to take steps at the request of the data subject prior to entering into a contract and if the contract is concluded, for the period necessary to perform the contract, until its termination or other expiry of the contract; 	<p>Maximum scope: name and surname, e-mail address, other data provided by the data subject, if any, in their CV or cover letter – included also image.</p>

Newsletter	<p>Article 6(1)(b) GDPR (consent of the data subject)</p> <p>The retention of data depends on the legal basis – respectively:</p> <ol style="list-style-type: none"> 1) for the period of providing newsletter service or till the withdrawn of the consent; 2) for the duration of the legitimate interest pursued by the Administrator, in order to demonstrate that newsletter services were provided on the basis of previous consent of data subject. 	<p>Maximum scope: name and surname, e-mail address</p>
Direct Marketing	<p>Article 6(1)(f) GDPR (legitimate interests pursued by the controller)</p> <p>The data is stored for the duration of the legitimate interest pursued by the Administrator (e.g. for the period necessary to perform the contract) or until effective objection has been expressed.</p>	<p>Maximum scope: name and surname, e-mail address</p>
Keeping statistics and analysis of Website traffic	<p>Article 6(1)(f) GDPR (legitimate interests pursued by the controller)</p> <p>The data is stored for the duration of the legitimate interest pursued by the Administrator (e.g. for the period necessary to perform the contract) or until effective objection has been expressed.</p>	<p>The data is to maintain statistics and include particular: approximate geolocation information, sites you have visited, session time, name of your OS and browser, data of your visit</p>

DATA RECIPIENTS ON THE WEBSITE

For the Website to work properly the Administrator must use services of external providers (such as a hosting company or provider of the newsletter). The Administrator uses services provided only by such processing operators who provide sufficient guarantee to implement appropriate technical and organizational measures, so that the processing meets the GDPR requirements and protects the rights of the data subject.

The transfer of personal data by the Administrator is not done each time and is not done to all recipient or categories of recipients indicated in the Privacy Policy – the Administrator transfers data only if the Administrator has the data and if it is necessary to carry out the purpose of data processing and only in the scope necessary to carry it out.

We also inform you that we transfer personal data to third countries. We use software that stores data on the servers located in third countries, in particular the United States. VS ensures that we carefully select partners, which we cooperate with. All our software providers from the third countries have joined the Privacy Shield. This is a guarantee that they respect your personal data in accordance with GDPR rules.

RIGHTS OF THE DATA SUBJECT

1. **Right to access, rectify, restrict, delete or transfer** – the data subject may demand from the Administrator to have access to their personal data, to rectify it, to delete it (“the right to be forgotten”) or to restrict the processing thereof, may make an objection against the processing and may transfer their data. Detailed terms and conditions of exercising the above rights are set out in Art. 15-21 of the GDPR.
2. **Right to withdraw the consent at any time** – the data subject whose data is processed by the Administrator on the basis of their consent (according to Art. 6 (1)(a) or Art. 9(2)(a) of the GDPR) may withdraw their consent at any time and this will not affect the lawfulness of the processing done prior to the withdrawal.
3. The right to make a complaint to a supervisory authority – the data subject may file a complaint to a supervisory authority in the manner laid down in the GDPR and in the provisions of Polish law, including but not limited to the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office.
4. **Right to object** – the data subject has a right to object at any time – on the grounds related to their specific situation – against the processing of their data on the basis of Art. 6 (1)(e) (public tasks or interest) or Art. 6 (1)(f) (legitimate interest of the controller), including profiling on the basis of the same provisions. In such case the Administrator may no longer process such personal data unless the Administrator demonstrates that there are valid legitimate grounds for processing which overrides the interests, rights and freedoms of the data subject or for establishing, pursuing or defending a claim.
5. **Right to object against direct marketing**
– if personal data is processed for the purpose of direct marketing, the data subject may at any time object against the processing of their data for such purpose, including the profiling, to the extent that the processing is linked to such direct marketing..

To exercise the rights referred to in this section of the Privacy Policy you may contact the Administrator by sending relevant message in writing or by e-mail to the Administrator’s address or to the address of the data protection inspector appointed hereinabove, or by using the contact form on the Website.

COOKIES ON THE WEBSITE, OPERATIONAL DATA AND ANALYTICS

1. Cookies

Cookies are small pieces of text information in the form of text files sent through the server and saved on the device of the Website visitor (e.g. on the hard drive of a computer, laptop or smartphone’s memory card – depending on the device used by the Website visitor). Detailed information on cookie files with their history and origin is available at https://en.wikipedia.org/wiki/HTTP_cookie.

When a visitor uses the Website, the Administrator may process data contained in the cookie files for the following purposes:

(1) provide basic functionalities of the Website such as session continuity, storage of dynamic data such as statistics, summaries, (2) adjusting the content of the Website to the Customer’s personal preferences (e.g. language of the site), (3) keeping statistics, through which may identify a way of using the Website by his users, thanks to this it is possible to improve a level of satisfaction by using the Website (user experience design) and (4) remarketing, it means a research on the behavior of Website users through anonymous analysis of their activities (e.g. from which sources they entered on Website, which content they were interested) in order to create their profile and provide them online advertisements which is close to their interests, when they visit websites which use Google Inc. Display Network plugins.

Typically the majority of available web browsers automatically accept cookies by default. Each user may define in their browser’s settings how cookies are to be used. This means you can e.g. partially limit (e.g. for a certain period of time) or completely block saving cookies – in the latter case this may affect some functionalities of the Website (for example it may become impossible to remember what language you have selected on the Website).

Browser's cookie settings are significant when it comes to a consent for using cookie files by the Website and its Administrator – according to the provisions of law, the consent may also be expressed by the browser's settings. If you refuse to give such consent, you should also change your browser's cookie setting accordingly.

Detailed information on how to change cookie settings and how to delete them in the most popular web browsers is available in Help section of your web browsers.

2. Google Analytics

On the Website we use a tool called Google Analytics, which is provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA).

Google Analytics helps us in analyzing the traffic on the Website. The collected data is processed in the above service in an anonymized way to generate statistics helpful for the Administrator of the Website. These data are aggregated and anonymous in nature. It means that they do not contain any details through which is possible to identify the visitors of the Website.

Through the aforementioned service we collect such data as the source and medium of obtaining users of the Website, the way of their behavior on the Website, information which electronic devices they using, IP and domain, geographic data and demographic data (age, sex) and interests.

Specific information about using the data in the Google Analytics service you can find under the below link:
<https://support.google.com/analytics/answer/3379636?hl=en>.

3. Google Ads

On the Website we use a tool called Google Ads, which is provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA).

Google Ads enables us to conduct marketing activities. Through this tool, we can present our offer in search results in Google, as well as on other websites that have joined to Google Ads program. Thanks to this service, we can verify the effectiveness of our advertisements and also optimize our marketing actions. The collected data is processed in the above service in an anonymized way.

Specific information about using the data in the Google Ads service you can find under the below link:
<https://policies.google.com/privacy>.

4. HubSpot

On the Website we use HubSpot software, which is provided by HubSpot, Inc. (25 First Street, 2nd Floor, Cambridge, MA 02141 USA).

HubSpot helps us in analyzing the behavior of Website users. Thanks to this software, we can improve Website "users experience" optimize content and functionality. The collected data is processed in the above service in an anonymized way to generate statistics helpful for the Administrator of the Website. Thanks to the HubSpot, we know what kind of actions take users of our Website.

Specific information about using the data in the HubSpot software you can find under the below link:
<https://legal.hubspot.com/privacy-policy>.

5. Hotjar

On the Website we use a tool called Hotjar, which is provided by Hotjar Ltd (St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta).

Hotjar helps us in analyzing the behavior of Website users. Thanks to this tool, we can improve Website "users experience", optimize content and functionality. The collected data is processed in the above service in an anonymized way to generate statistics helpful for the Administrator of the Website. Thanks to the Hotjar, we know what kind of actions take users of our Website. However we can not identify action taken by a particular user.

Specific information about using the data in the Hotjar you can find under the below link: <https://www.hotjar.com/privacy>.

6. Facebook Pixel

On the Website we use the Facebook Pixel tool, provided by Facebook, Inc. (1601 S. California Ave., Palo Alto, CA 94304, USA).

Facebook Pixel enables us to conduct marketing activities. This tool, in an automatic way, saves the behavior of our users. Thanks to this we can target advertisements on Facebook to users of our Website. The collected data is processed in the above service in an anonymized way. Thanks to the Facebook Pixel, we know what kind of actions take users of our Website. However, we can not identify the action taken by a particular user.

Specific information about using the data in the Hotjar you can find under the below link: <https://www.facebook.com/privacy/explanation>.

7. LinkedIn Insight Tag

On the Website we use the LinkedIn Insight Tag, provided by LinkedIn Corporation (2029 Stierlin Court, Mountain View, CA 94043, USA).

LinkedIn Insight Tag enables us to conduct marketing activities. This tool, in an automatic way, saves the behavior of our users. Thanks to this we can target advertisements on LinkedIn to users of our Website. The collected data is processed in the above service in an anonymized way. Thanks to the LinkedIn Insight Tag, we know what kind of actions take users of our Website. However, we can not identify the action taken by a particular user.

Specific information about using the data in the Hotjar you can find under the below link: <https://www.linkedin.com/legal/privacy-policy>.

EXTERNAL LINKS

On our Website, you can also find links to the other websites. These websites are not covered by this Privacy Policy. By clicking on the link, the user will be moved to a different website. The Administrator does not have any impact on the content which is available on such website, and he also is not responsible for any acts or omissions of administrators of these websites.