

## **PRIVACY POLICY OF ODYSSEY SP. Z O.O.**

This Privacy Policy is intended to ensure the security and protection of personal data of our customers and users of our website. Odyssey Sp. z o.o. complies with regulations regarding the protection of personal data, including the provisions of the General Data Protection Regulation (GDPR).

### 1) Personal Data Controller

The personal data controller is Odyssey Sp. z o.o. with its registered office at ul. Zimorodka 7, 87-100 Toruń, entered into the National Court Register (KRS) under number 0000401684, NIP 956-229-80-21, REGON 341206200.

### 2) Data Protection Officer

Contact with the Data Protection Officer is possible via the following email address: [alerts@odyspap.pl](mailto:alerts@odyspap.pl).

### 3) Purposes and Legal Grounds for Processing

- i. Contact form handling: art. 6 point 1 subpoint (b) of GDPR.
- ii. Own marketing (upon consent): art. 6 point 1 subpoint (a) of GDPR.
- iii. Statistics and traffic analysis (Google Analytics): art. 6 point 1 subpoint (f) of GDPR (legitimate interest; traffic analysis allows for the improvement of the service, while the impact on individual rights is minimal).

### 4) Scope of Processed Data

We collect only the data voluntarily provided in the form: name, surname, email address, and phone number.

### 5) Data Recipients

Data may be processed by entities providing IT and hosting services, as well as network support. These processors are located exclusively within the EU (no transfers to third countries). Requests for full data recipient information can be sent to: [alerts@odyspap.pl](mailto:alerts@odyspap.pl).

### 6) Data Retention Period

- i. Contact form data: 3 years from the date the form was sent.
- ii. Data processed based on marketing consent: Until the consent is withdrawn.

### 7) Marketing Consent Mechanism

Marketing consent is collected via a separate checkbox (opt-in), which is unchecked by default. We record the date, time, and IP address of the consent in our system.

### 8) Cookies

#### 8.1) Types and Purposes

- i. **\*\*Necessary (session) \*\*** – deleted after closing the browser (lifetime = runtime).
- ii. **\*\*Analytical (Google Analytics): \*\***
- iii. ``_ga`` – Identifies the user; expires after 2 years.
- iv. ``_gid`` – Identifies the session; expires after 24 hours.
- v. ``_gat`` – Limits the number of requests; expires after 1 minute.

#### 8.2) Management and Withdrawal of Consent

The user can withdraw consent for cookies at any time through browser settings or the "Withdraw Consent" button in the cookie information window. After withdrawing cookies that are not essential for the website's operation, some functions of the service may be limited.

9) Rights of Data Subjects

You have the right to access, rectify, erase, restrict processing, transfer data, object to processing based on art. 6 point 1 subpoint (f) of GDPR, and withdraw consent at any time.

9.1) Fulfillment Procedure

Applications are considered within 1 month of receipt. In justified cases, this period may be extended by an additional 2 months, of which the applicant will be informed.

9.2) Complaint to the Supervisory Authority

A complaint can be lodged with the President of the Personal Data Protection Office (Prezes UODO, ul. Moniuszki 1a, 00-014 Warsaw) in the event of improper data processing.

10) Security Measures

We use transmission encryption (TLS), regular data backups, access control to IT systems, and incident response procedures.

11) Changes to the Privacy Policy

The policy may be updated; every change will be published with its effective date.