

Privacy Policy

The following Privacy Policy sets out the principles for storing and accessing data on the Devices of Users using the Service for the purposes of the provision of electronic services by the Processor, as well as the principles for the collection and processing of personal data of Users, which were provided by them personally and voluntarily through the tools available on the Service.

§1 Definitions

Service - the "cWatch Dashboard" website operating at <https://app.c.watch>.

External Service - websites of partners, service providers or service recipients cooperating with the Processor.

Processor of personal data/ Data - the Administrator of the Service and the Data processor of personal data (hereinafter referred to as the Processor) is the company "WearTech Solutions Sp. z o. o.", conducting business at: 71 Żurawia Street, 15-540 Białystok, with assigned tax identification number (NIP): 9662130404, with assigned KRS number: 0000788441, providing services electronically through the Service.

User - a natural person for whom the Processor provides services electronically through the Website.

Device - an electronic device with software, through which the User accesses the Website.

Cookies - text data collected in the form of files placed on the User's Device.

GDPR - 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).

Personal data - means information about an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

Processing - means an operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, ordering, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing - means the marking of stored personal data for the purpose of restricting their future processing.

Profiling - means any form of automated processing of personal data which involves the use of personal data to evaluate certain personal factors relating to an individual, in particular to analyse or

predict aspects relating to that individual's performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movement.

Consent - consent of the data subject means a freely given, specific, informed and unambiguous indication of the will by which the data subject, either by a statement or by a clear affirmative action, gives his or her consent to the processing of personal data concerning him or her.

Personal data breach - means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or unauthorised access to personal data transmitted, stored or otherwise processed

Pseudonymisation - means the processing of personal data in such a way that they can no longer be attributed to a specific data subject, without the use of additional information, provided that such additional information is kept separately and is covered by technical and organisational measures which make it impossible to attribute it to an identified or identifiable natural person.

Anonymisation - Data anonymisation is an irreversible process of data operations that destroys / overwrites "personal data" making it impossible to identify, or link, a particular record to a specific user or individual.

§2 Data Protection Officer

Pursuant to Article 37 RODO, the Processor has not appointed a Data Protection Officer. For matters concerning data processing, including personal data, please contact the Processor directly.

§3 Types of Cookies

Internal cookies - files placed and read from the User's Device by the Service's data communications system.

External Cookies - files placed and read from the User Device by tele-information systems of external Services. The scripts of external Services that may place Cookies on User Devices have been deliberately placed on the Website through scripts and services made available and installed on the Website.

Session Cookies - files placed and read from the User's Device by the Service during a single session of a given Device. At the end of the session, the files are deleted from the User Device.

Persistent cookies - files placed and read from the User Device by the Website until they are manually deleted. The files are not deleted automatically after the end of a session of the Device, unless the configuration of the User Device is set to delete cookies after the end of a session of the Device.

§4 Data storage security

Mechanisms for storing and reading Cookies - The mechanisms for storing, reading and exchanging data between Cookies stored on the User's Device and the Website are implemented through the built-in mechanisms of web browsers and do not allow other data

to be retrieved from the User's Device or from other websites visited by the User, including personal data or confidential information. The transfer of viruses, Trojan horses and other worms to the User Device is also practically impossible.

Internal cookies - the cookies used by the Processor are safe for the User's Device and do not contain scripts, content or information which may threaten the security of personal data or the security of the Device used by the User.

External cookies - The Processor makes all possible efforts to verify and select service partners in the context of User security. The Processor selects well-known, large partners with global public trust for cooperation. However, the Processor does not have full control over the content of cookies from external partners. The Processor is not responsible for the security of cookies, their content and their use by the Scripts installed in the service, coming from external services in compliance with the licence, as far as the law allows. The list of partners can be found further on in the Privacy Policy.

Cookie control

The user can, at any time, independently change the settings for storing, deleting and accessing stored cookies by each website

Information on how to disable cookies in the most popular browsers is available on the website: [how to disable cookies](#) or from one of the designated providers:

[Managing cookies in Chrome browser](#)

[Managing cookies in Opera browser](#)

[Managing cookies in FireFox](#)

[Managing cookies in Edge browser](#)

[Managing cookies in Safari](#)

[Managing cookies in Internet Explorer 11](#)

The User may, at any time, delete any Cookies stored to date using the tools of the User Device through which the User accesses the Website's services.

Threats on the part of the User - The Processor uses all possible technical measures to ensure the security of the data placed in cookies. However, it should be noted that ensuring the security of this data depends on both parties including the User's activity. The Processor is not responsible for interception of this data, impersonation of the User's session or its deletion, as a result of the User's conscious or unconscious activity, viruses, Trojan horses and other spyware with which the User's Device may be or has been infected. In order to protect themselves from these threats, Users should follow the rules for safe use of the Internet.

Storage of personal data - The Processor ensures that he makes every effort to ensure that the processed personal data entered voluntarily by the Users are secure, access to them is

limited and carried out in accordance with their purpose and the purposes of processing. The Processor also ensures that it makes every effort to secure the data it holds against loss, by applying appropriate physical as well as organisational safeguards.

Storage of passwords - The Processor declares that passwords are stored in an encrypted form using the latest standards and guidelines in this respect. It is virtually impossible to decrypt account passwords provided on the Website.

§5 Purposes for which cookies are used

- To improve and facilitate access to the Website
- To personalise the website for users
- Enabling log-in to the website
- Keeping statistics (users, types of devices, links, etc.)

§6 Processing purposes of personal data

Personal data voluntarily provided by Users are processed for one of the following purposes:

- Implementation of electronic services:
 - Services of registration and maintenance of the User's account on the Website and functionalities related to it
- Communication of the Processor with Users on matters related to the Service and data protection
- Ensuring the legitimate interest of the Processor

Data about Users collected anonymously and automatically is processed for one of the following purposes:

- Conducting statistics
- Ensuring the legitimate interest of the Processor

§7 Cookies of External Services

The Processor uses javascript and web components of partners on the Website, who may place their own cookies on the User's Device. Please note that you can decide for yourself in your browser's settings which cookies may be used by individual websites. Below is a list of the partners or their services implemented on the Website that may place cookies:

Maintenance of statistics:

Google Analytics

The services provided by third parties are beyond the control of the Processor. These entities may change their terms of service, privacy policies, purpose of data processing and use of cookies at any time.

§8 Types of data collected

The Website collects data on Users. Part of the data is collected automatically and anonymously, and part of the data is personal data voluntarily provided by Users when signing up for particular services offered by the Website.

Anonymous data collected automatically:

- IP address
- Browser type
- Screen resolution
- Type of operating system
- Browser language

Data collected during registration:

- First name / last name / nickname
- Login
- E-mail address
- IP address (collected automatically)

Data collected when subscribing to the Newsletter service

- E-mail address

Part of the data (without identifying information) may be stored in cookies. Part of the data (without identifying information) may be transmitted to a statistical service provider.

§9 Access to personal data by third parties

As a rule, the only recipient of personal data provided by Users is the Processor. Data collected as part of the services provided is not transferred or resold to third parties.

Access to the data (usually on the basis of the Contract for entrustment of data processing) may have entities responsible for maintenance of infrastructure and services necessary for running the service, i.e:

- Hosting companies, providing hosting or related services to the Processor

Entrustment of personal data processing - Hosting, VPS or Dedicated Servers services

In order to run the website, the Processor uses an external provider of hosting, VPS or Dedicated Servers - Amazon Web Services. All data collected and processed on the website is stored and processed in the infrastructure of the service provider located within the gramic of the European Union. There is the possibility of access to the data as a result of maintenance work carried out by the service provider's staff. Access to this data is governed by an agreement between the Processor and the Service Provider.

§10 Processing of personal data

Personal data provided voluntarily by Users:

- Personal data will not be transferred outside the European Union, unless they have been published as a result of an individual action by the User (e.g. entering a comment or a post), which will make the data available to any visitor to the website.
- Personal data will not be used for automated decision-making (profiling).
- Personal data will not be resold to third parties.

Anonymous data (without personal data) collected automatically:

- Anonymous data (without personal data) will not be transferred outside the European Union.
- Anonymous data (without personal data) will not be used for automated decision-making (profiling).
- Anonymous data (without personal data) will not be resold to third parties.

§11 Legal bases for processing personal data

The Service collects and processes Users' data on the basis of:

- 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)
- Article 6(1)(a)

the data subject has given his or her consent to the processing of his or her personal data for one or more specified purposes

- article 6(1)(b)

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

- Article 6(1)(f)

processing is necessary for the purposes of the legitimate interests pursued by the Processor or by a third party

§12 Processing period for personal data

Personal data provided voluntarily by Users:

As a rule, the personal data indicated are stored exclusively for the duration of the provision of the Service within the Service by the Processor. They are deleted or anonymised up to 30 days after the termination of the service (e.g. deletion of a registered user account, unsubscribing from the Newsletter list, etc.).

The exception to this is when it is necessary to safeguard the legitimate purposes of further processing of this data by the Processor. In such a situation, the Processor will store the indicated data from the time of the User's request for deletion, no longer than for a period of 3 years in case of violation or suspected violation of the provisions of the regulations of the service by the User.

Anonymous data (without personal data) collected automatically:

Anonymous statistical data, not constituting personal data, is stored by the Processor for the purpose of keeping service statistics for an indefinite period of time

§13 Users' rights related to the processing of personal data

The Website collects and processes Users' data on the basis of:

Right of access to personal data

Users have the right to access their personal data, exercised upon request made to the Processor

Right to rectification of personal data

Users have the right to request the Processor to promptly rectify their personal data that is inaccurate and/or to complete incomplete personal data, exercised upon request made to the Processor

Right to delete personal data

Users have the right to demand from the Processor immediate deletion of their personal data, carried out upon request submitted to the Processor. In the case of user accounts, deletion of data consists in anonymisation of data enabling identification of the User. The Processor reserves the right to withhold the data deletion request in order to protect the legitimate interest of the Processor.

Right to restrict the processing of personal data

Users have the right to restrict the processing of their personal data in the cases indicated in Article 18 of the RODO, such as questioning the accuracy of their personal data, exercised upon request made to the Processor.

Right to personal data portability

Users have the right to obtain from the Processor, personal data concerning the User in a structured, commonly used format suitable for machine reading, exercised upon request made to the Processor

Right to object to the processing of personal data

Users have the right to object to the processing of their personal data in the cases set out in Article 21 of the RODO, exercised upon request made to the Processor

Right to lodge a complaint

Users have the right to lodge a complaint with the supervisory authority in charge of personal data protection.

§14 Contact to the Processor

The Processor can be contacted in one of the following ways

Postal address - WearTech Solutions Sp. z o. o., 71 Żurawia St., 15-540 Białystok

E-mail address - info@c.watch

§15 Service requirements

Restricting the storage of and access to cookies on the User's Device may cause some of the Website's functions to work incorrectly.

The Processor shall not be held liable for malfunctions of the Website if the User restricts in any way the saving and reading of cookies.

§16 External links

The Service - articles, posts, entries or comments of Users may contain links to external sites with which the Owner of the Service does not cooperate. These links, as well as the sites or files indicated underneath them, may be dangerous to your Device or pose a threat to the security of your data. The Processor shall not be held liable for the content located outside the Service.

§17 Changes to the Privacy Policy

The Processor reserves the right to change this Privacy Policy at any time without notifying the Users with regard to the use and application of anonymous data or the use of cookies.

The Processor reserves the right to amend this Privacy Policy at any time with regard to the processing of Personal Data, of which it will inform Users who have user accounts or who are subscribed to the newsletter service, via email within 7 days of the change of records. Continued use of the services implies that the User has read and accepts the changes made to the Privacy Policy. In the event that the User does not agree with the introduced changes, he/she is obliged to delete his/her account from the Service or unsubscribe from the Newsletter service.

The introduced changes to the Privacy Policy will be published on this subpage of the Service.

The introduced changes shall enter into force upon their publication.