

**PRIVACY POLICY OF THE INTERNET SERVICE**  
**WWW.HEADACHESCHOOL.PL**

1. The Personal Data Administrator on the Internet Service at: [www.headacheschool.pl](http://www.headacheschool.pl), hereinafter referred to as the **Internet Service**, is: Stowarzyszenie na Rzecz Rozwoju Rynologii „Rynologia Polska”, with registered office at the following address: ul. Hoża 37/5, 00-681 Warszawa, registered in the register of associations, other social and professional organizations, foundations and independent public healthcare institutions under KRS number: 0000125143, Tax ID (NIP): 5262695388, National Business Registry Number (REGON): 015213595, hereinafter referred to as the **Administrator**.

2. With respect to your rights as personal data subjects (i.e. people to whom the data relates) and with respect to the mandatory rules of law, including especially the Regulation of the European Parliament and the Council (EU) 2016/679 of 27 April 2016 on 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/WE (General Data Protection Regulation), hereinafter referred to as **GDPR**, the Polish personal data protection Act of 10 Mai 2018 (hereinafter referred to as **the Act**) and other relevant personal data protection laws, we commit to maintaining the safety and confidentiality of all personal data that you share with us. All our employees have been properly trained in personal data protection, and our company, as the Administrator, has introduced new security measures, as well as technical and organisational means, in order to ensure the highest possible level of personal data protection. We have introduced appropriate procedures and policies to process personal data in accordance with GDPR, so that personal data processing occurs lawfully and reliably and you, as the persons to whom the data relates, may execute all your relevant rights. Additionally, if needed, we cooperate with the regulatory body within the territory of the Republic of Poland, i.e. the President of the Data Protection Authority (hereinafter referred to as PDPA).

3. Our Internet Service collects the following personal data:

- a) name and surname, gender, academic title, Profession Number (NPWZ), specialization, place of work, address (place of work, registered office, main or residence) and other data indicated in the registration form – the data may be processed, when you, as users of our Internet Service, fill in the registration form on the Internet Service to participate in a conference or event; in addition, you can provide personal data via e-mail, traditional mail or via phone, when these methods are used in order to utilise the services of our Internet Service,
- b) telephone number – may be processed in cases of telephone contact between us and you, as users of our Internet Service, as well as when you provide us your telephone number via e-mail or traditional mail in order to allow us to contact you when needed, including unexpected events, in order to be able to offer you the most favourable solution to a problem, as well as in order to provide answers to questions relating to our Internet Service,

- c) e-mail address – may be processed when you, as users of our Internet Service, provide us with your e-mail address when contacting us via e-mail, or via traditional mail or telephone; your e-mail is used to send you confirmation of registration for the conference or event, contact you when needed, in matters related to the provision of our services, as well as to answer your questions relating to our Internet Service,
- d) Tax Identification Number - we collect the Tax Identification Number from entrepreneurs and persons who require invoicing and have a Tax Identification Number,
- e) IP address of a device – the general information relating to the usage of Internet-based connections, such as IP addresses (and other information contained in the system logons) are used for technical reasons, and the IP addresses may also be used for statistical purposes, especially collecting general demographic data (e.g. about the region from which a connection is received),
- f) other data may be collected within the scope of conducting other matters, or may be provided by you, as users of our Internet Service via e-mail, traditional mail or via phone.

4. Provision of the data specified above is mandatory in the following circumstances:

- a) in order to use the services offered on our Internet Service, including for registration for a conference or event,
- b) in order to answer your questions and enable contact via email, traditional post or telephone contact.

5. Our Internet Service utilises the Cookies technology to match its functionality to your individual needs. Therefore, you can agree that the data and information you enter will be remembered so that you can use them the next time when you visit our Internet Service without having to re-enter them. Owners of other websites will not have access to this data and information. If, however, you do not agree to personalisation of the Internet Service, you may disable the Cookies in your Internet browsers.

6. Anyone using our Internet Service may choose whether and how they wish to use our services and share their data and information within a certain scope, as per this Privacy Policy.

7. As per the rule of minimisation, we only process the categories of personal data that are considered necessary to achieve purposes specified in the point 3 and 4 above.

8. We shall process the personal data only for however long it is necessary to achieve said purposes specified in the point 3 and 4 above. The personal data may be processed for a longer period of time only when the Administrator is required by the relevant mandatory rules of law to do so, by the legally justified interest of the Administrator, referred to in point 10c below (i.e. during the period of limitation of claims or termination of relevant proceedings, if they were instituted in the limitation period) or when the provided service is continuous.

9. The source of the personal data processed by the Administrator are the persons to whom the data relates.

10. The legal basis for processing your personal data is, first and foremost:

- a) art. 6.1.b of the GDPR, i.e. processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, or
- b) art. 6.1.c GDPR, i.e. indispensability to fulfill legal obligations incumbent on the Administrator, or
- c) art. 6.1.f of the GDPR, i.e. legitimate interests pursued by the Administrator, such as determining, demanding, or defending claims, until they lapse or until the relevant proceedings are completed, if they were initiated within that period, or
- d) art. 6.1.a of the GDPR, i.e. your consent to the processing of personal data for one or more specific purposes, when other legal bases for data processing are not applicable.

11. Your personal data shall not be shared with any third country or international organization, as per the GDPR. If the personal data is shared with a third country or international organization, you shall be duly informed thereof, and the Administrator shall utilise security measures, as per Chapter V of the GDPR.

12. No personal data is shared with any third parties without express consent of the person to whom the data relates. Personal data may be shared without the consent of the person to whom it relates only with legal public bodies, i.e. government and administrative bodies (e.g. tax offices, judicial authorities and other entities with a mandate stipulated by the relevant mandatory rules of law).

13. Personal data may be shared with entities that process the data on our request, i.e. on the request of the Administrator. In such cases, as the Administrator, we conclude a contract for personal data processing with such an entity. The processing entity processes the shared personal data solely for purposes specified in the aforementioned contract. Without sharing the personal data with such entities we would not be able to conduct our business activity in our Internet Service. As the Administrator, we share the personal data for processing with the following entities:

- a) providing hosting services for the Internet Service,
- b) providing other services to us, which are necessary for the proper functioning of the Internet Service.

14. The personal data is not profiled by the Administrator, as per the GDPR.

15. According to the GDPR, each person whose personal data is being processed by the Administrator as the right to:

- a) be informed of the processing of their personal data, as per art. 12 of the GDPR,
- b) have access to their personal data, as per art. 15 of the GDPR,
- c) correct or update the personal data, as per art. 16 of the GDPR,

- d) delete the data (the right to be forgotten), as per art. 17 of the GDPR,
- e) limit the processing, as per art. 18 of the GDPR,
- f) transfer the data, as per art. 20 of the GDPR,
- g) file a rejection to the processing of the personal data, as per art. 21 of the GDPR,
- h) in the case of the legal basis referred to in point 10d above - the right to withdraw consent at any time without affecting the legality of the processing, which was made on the basis of consent before its withdrawal,
- i) refuse profiling, as per art. 22 relating to art. 4.4 of the GDPR,
- j) file a complaint to a regulatory body (i.e. to the President of the Data Protection Authority), as per art. 77 of the GDPR,

taking into account the rules of using and exercising these rights resulting from the provisions of the GDPR.

16. Should you wish to exercise any of your abovementioned rights, please send a message by e-mail to an e-mail address or in writing to the correspondence address referred to in point 17 below.

17. Our company, as the Administrator, has appointed the Data Protection Supervisor, who is Konrad Cioczek. Any questions, requests or complaints relating to personal data processing in our company (the Administrator), hereinafter referred to as **Applications**, should be sent to the following e-mail address of the Data Protection Supervisor: [iodo@magazynorl.pl](mailto:iodo@magazynorl.pl), or in writing to the postal address of the Administrator: ul. Hoża 37/5, 00-681 Warszawa.

18. The Application should clearly contain:

- a) the data of the person or persons to whom the Application relates,
- b) the event that the Application relates to,
- c) the filed requests and their legal basis,
- d) the desired means of solving the issue.

19. Each ascertained instance of security breach is documented, and should any of the events, as described by the GDPR or the Act, occur, the persons to whom the data relates, as well as the PDPA, if applicable, shall be informed of it.

20. All capitalized words have the meaning given to them in the Regulations posted on our Internet Service, unless otherwise stated in the content of this Privacy Policy.

21. The provisions of this Privacy Policy apply, as far as possible, to all persons with whom we are in legal relations and for whom we also are Administrator of their personal data, including in particular our contractors and participants of the conferences and events organized by us.

22. All matters not regulated by this Privacy Policy shall be regulated by the relevant mandatory rules of law. Should any of the provisions of this Privacy Policy not comply with the abovementioned rules of law, the rules of law shall take precedence.