

## WEBSITE PRIVACY POLICY

Maintaining the confidentiality of your personal data is extremely important to us. We would like to inform you about how we protect your privacy in connection with the use of the website available at [www.studentdepot.pl](http://www.studentdepot.pl) (hereinafter: the “**Website**”).

This privacy policy (the “**Policy**” comprehensively describes the grounds for and means of processing your personal data and your rights in relation to such processing.

The Policy is addressed to individuals who:

- are visiting the Website;
- have consented to the sending of commercial information and direct marketing;
- submit their personal data on the Website for the purpose of contacting the personal data controller, making enquiries, complaints, etc.,
- participate in competitions organised by the personal data controller.

(hereinafter: “**you**”).

Depending on the situation, the controller of your personal data will be one of the companies in the Student Depot group:

- **Student Depot sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000767970 and NIP 7010903397;
- **Lakina sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000727938 and NIP 7010818326;
- **Student Depot Kraków sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000901803 and NIP 7872107600;
- **Student Depot Duet sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000581137 and NIP 5223041292;
- **Student Depot Salsa sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000546058 and NIP 1182105891;
- **Student Depot Łódź 2 sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000717690 and NIP 7010800467;
- **Zerta sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000423002 and NIP 1182085071;
- **Student Depot Foxtrot sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000620947 and NIP 7010581261;
- **5th Inwestycje 8 sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000703105 and NIP 5213801330;
- **Student Depot Funky sp. z o.o.** with its registered office in Warsaw, Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, KRS 0000618838 and NIP 5223063632

For all matters relating to the processing of your personal data, please contact us by email at [rodo@studentdepot.pl](mailto:rodo@studentdepot.pl) or by sending a letter to: Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, indicating to which company of the Student Depot group it is addressed.

## 1 Definitions

Whenever this Policy refers to:

- 1) **personal data** - means information about an identified or identifiable natural person;
- 2) **Student Depot** - it shall be understood to mean collectively all, some or separately (depending on the context) the companies of the Student Depot group indicated above;
- 3) **cookies** - means IT data stored on the User's terminal equipment through which he/she uses the Website, containing data about the User's use of the Website;
- 4) **Policy** - means this document. It defines the principles according to which the User's personal data are processed on the Website;
- 5) **GDPR** - means Regulation 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC;
- 6) **Website** - means the website available at [www.studentdepot.pl](http://www.studentdepot.pl) through which the User may use the Services;
- 7) **Services** - means the services provided by Student Depot to the User. These services include, but are not limited to: providing answers to questions and direct marketing;
- 8) **User** - shall be understood to mean any person using the Website.

## 2 The purpose of processing

Student Depot processes your data exclusively on the basis of the grounds indicated in Article 6(1) of the GDPR, i.e.:

- on the basis of your consent (Article 6(1)(a) of the GDPR)  

The Student Depot processes your personal data for the purpose of direct marketing and for the purpose of enabling you to enter competitions only on the basis of your specific, free, informed and prior consent for each of these activities separately. Any consent given may be withdrawn at any time. Please note that the withdrawal of consent is only effective for the future and does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

As part of these activities, we process only the personal data necessary for this purpose, such as contact details and basic identification data that you have provided in the contact form available on the Website.
- for the purposes of legitimate interests pursued by the controller or a third party (Article 6(1)(f) of the GDPR)  

Processing may be considered necessary for the legitimate interests of Student Depot or a third party if it does not unduly affect your interests or fundamental rights and freedoms. When processing personal data on this basis, we always seek to balance our legitimate interests with your privacy.

The legitimate interests of the Student Depot are, in particular, the following:

- 1) exercise or defence of claims arising out of the operation of the business;
  - 2) processing of data in connection with the sending of commercial information by means of electronic communication;
  - 3) profiling for marketing purposes, including profiling using data derived from cookies;
  - 4) analysis of Users' behaviour on the Website for statistical purposes, improvement of the quality of the Services and security;
  - 5) taking care of the security of IT systems;
  - 6) carrying out analyses on the ways in which the Website is used, as well as the possibility of making improvements or corrections to the Website;
  - 7) handling enquiries made to Student Depot via the contact form.
- where the processing is necessary for the performance of contractual obligations towards you or, in accordance with your request, it is necessary to take specific steps prior to entering into an agreement (Article 6(1)(b) of the GDPR)

Student Depot processes your personal data provided by you on the website in order for you to create and use your User account.

### **3 Categories of personal data**

As part of the Website, we process the following categories of personal data:

- 1) identification and contact data indicated in the contact form, such as name, email address, telephone number and other personal data indicated in the body of the request;
- 2) personal data provided as part of telephone calls and correspondence - if you contact us by telephone or correspond with us through other channels, we will process all information, including personal data, that you choose to provide to us in the course of the call or correspondence;
- 3) username and login password - in connection with the creation of a User account on the Website;
- 4) personal data voluntarily provided for the purpose of direct marketing by means of a telephone call - your name and telephone number and, if you consent to receive commercial information from Student Depot, your name, email address and telephone number;
- 5) automatically collected data - in the course of using the Website, some personal data may be collected by us by automated means (e.g. the User's IP address). This applies in particular to information concerning your activity on the Website, your preferences and your use of the Website. This data is collected by cookies and similar technologies. For information on how cookies are used on the Website, please refer to the separate cookie policy, which is available here: [www.studentdepot.pl](http://www.studentdepot.pl) . Please read them before using the Website;

- 6) personal data processed in connection with participation in our competitions - name, surname, e-mail address, correspondence address, telephone number.

#### **4 Sources of personal data**

We collect your personal data listed in section 3 above directly from you. This also applies to automatically collected data which you provide voluntarily when you start using the Website.

#### **5 Transfer of personal data to third parties**

Your personal data may be transferred to recipients and other third parties in order to fulfil the purposes listed in section 2 above to the extent that they are necessary for them to carry out the tasks commissioned by Student Depot, if required to do so by law or if they have another legal basis. The following may be considered as recipients or other third parties:

- (a) entities affiliated with Student Depot personally or by capital, subsidiaries of Student Depot;
- (b) entities that process personal data on behalf of Student Depot, such as entities that provide document archiving services or accounting services;
- (c) providers of IT systems and hosting services;
- (d) entities providing marketing services;
- (e) any national public administration (e.g. the Police), authorities of other EU Member States (e.g. data protection authorities in other Member States) or courts, if required by applicable national or EU law or at their request;
- (f) legal or tax advisors;
- (g) courier or postal service providers.

#### **6 Transfer of data outside the European Economic Area**

Your personal data may also be processed in a country outside the European Economic Area (“**EEA**”). Currently, Student Depot, for the purposes necessary to carry out its business, may transfer your personal data to the United Kingdom, the United States and the Philippines as a result of Student Depot’s partnership with RealPage UK Ltd, the provider of the PEX platform.

With regard to transfers of personal data to the UK, on 28 June 2021 the European Commission adopted an implementing decision finding an adequate level of protection for personal data in the UK under the GDPR. This means that transfers of personal data to the UK do not require the implementation of additional safeguards under Chapter V of the GDPR.

For transfers of personal data to the United States and the Philippines, an adequate level of personal data protection has not yet been established by the European Commission. However, we assure you that your personal data is adequately protected through the standard contractual clauses for the transfer of personal data to third countries under the GDPR, adopted by European Commission Implementing Decision (EU) 2021/914 of 4 June 2021. In accordance with Article 46(2) of the GDPR, the standard contractual clauses provide adequate safeguards for the transfer of personal data to third countries.

You may also request additional information regarding data transfers outside the EEA and obtain a copy of the appropriate safeguards by exercising your rights set out in section 8.

## 7 The data storage period

We only process personal data for the specified purpose and to the extent necessary to achieve this purpose and for as long as it is necessary to achieve this purpose. Where possible, we delete the data immediately when these purposes have been fulfilled. The purposes pursued by Student Depot in processing personal data and the periods for which personal data are processed in connection with them are listed below:

Name of the processing purpose	Description of the processing purpose	Legal basis for processing	Processing period
Processing of enquiries	Providing answers to enquiries made via the form available on the Website	Legitimate interests of Student Depot (article 6(1)(f) of the GDPR)	Period required for a response
Exercise or defence of claims	Establishing or exercising civil claims by Student Depot in the course of its business and defending against such claims	Legitimate interests of Student Depot (article 6(1)(f) of the GDPR)	6 years <sup>1</sup> or 3 years <sup>2</sup>
Telephone marketing	Conducting direct marketing by means of a telephone call	Voluntary consent (article 6(1)(a) of the GDPR)	Until you withdraw your consent or until Student Depot ceases direct marketing
Electronic marketing	Processing of personal data in connection with the sending of commercial information by means of electronic communication, i.e. e-mail, SMS and MMS messages	Legitimate interests of Student Depot (article 6(1)(f) of the GDPR)	Until either you object or Student Depot ceases to carry out marketing activities
Marketing profiling	User profiling for marketing purposes	Legitimate interests of Student Depot (article 6(1)(f) of the GDPR)	Until either you object or Student Depot ceases to carry out marketing profiling
User account	Creation and maintenance of the User's account on the Website	Agreement (article 6(1)(b) of the GDPR)	Until your account is deleted

<sup>1</sup> Limitation period for civil law claims, calculated from the date on which the claim became due - Article 118 of the Civil Code.

<sup>2</sup> Limitation period for civil claims related to the conduct of business, calculated from the date on which the claim became due - Article 118 of the Civil Code.

Organisation of competitions	Carrying out competitions	Voluntary consent (article 6(1)(a) of the GDPR)	Until you withdraw your consent or for the duration of the competition
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## 8 Users' rights

In relation to our processing of your personal data, you are entitled to:

- (a) the right of access to data, including the right to obtain a copy of the data;
- (b) the right to request rectification of the data;
- (c) the right to erasure of the data (right to be forgotten);
- (d) the right to restrict processing of the data;
- (e) the right to object to processing;
- (f) the right to withdraw consent where processing is carried out on that basis. The withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of consent before its withdrawal;
- (g) the right to data portability - for personal data processed on the basis of your consent;
- (h) the right to lodge a complaint with the supervisory authority for the protection of personal data, which in Poland is the President of the Office for Personal Data Protection, if you consider that the processing of personal data concerning you violates the provisions of the GDPR;
- (i) the right to obtain a copy of the security - this applies to cases of transfer of personal data outside the EEA area.

You may exercise the above rights by writing to: Plac Marszałka Józefa Piłsudskiego 2, 00-073 Warsaw, indicating to which company of the Student Depot group it is addressed or by sending an e-mail to [rodo@studentdepot.pl](mailto:rodo@studentdepot.pl).

Complaints to the President of the Personal Data Protection Office should be addressed to the address of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw. However, if you have concerns about our processing of your Personal Data, please let us know first and we will do our best to investigate the irregularities.

## 9 Consequences of not providing personal data

It is not compulsory for you to provide your personal data, but if you do so, the provision of Services to you may be significantly hindered or impossible. These effects depend on the purpose for which we process your personal data and may lead in particular to:

- (a) inability to undertake marketing activities towards you;
- (b) inability to contact you via the contact form on the Website;
- (c) inability to create a User account;
- (d) inability to use the Website;
- (e) inability to participate in competitions organised by us.

## **10 Automated decision-making, including profiling**

Student Depot may use data about your activity on the Website, including personal data for profiling purposes involving the automated processing of certain personal data. Profiling is the process of automatically processing information concerning you, including personal data, in order to best match the products or services offered by Student Depot to your needs. For this purpose, Student Depot uses the data referred to in section 3 above, i.e. both the data provided by you directly, as well as data collected through cookies and data obtained from external sources. On this basis, Student Depot learns about your preferences, adapts the offer of its products or services to them and decides whether to take specific marketing actions towards you or personalises the marketing messages it sends with your separate consent. As a result of these activities, however, Student Depot does not make decisions that are based solely on automated decision-making, including profiling, and that could have legal consequences for you or similarly affect you.

## **11 Policy update**

This Policy was updated on 8 September 2023 and may be subject to further changes. If required by law, any information regarding future changes or additions to the processing of personal data described in this Policy that may affect you will be communicated to you through the appropriate form of communication normally used by Student Depot in its dealings with you.