

## Privacy Policy

This Privacy Policy (“**Privacy Policy**”) defines the way of processing and protection of personal data of website users (“**User**”) available at wfc.pl (“**Portal**”), collected and processed in connection with the use of the Portal, including through the so-called “cookies”.

The Portal is owned by WFC Investments sp. z o.o., Plac Piłsudskiego 3, 00-078 Warszawa (“**Portal Owner**”).

The Portal Owner respects the privacy of the Portal Users and assures of its commitment to respect the applicable law within the scope of personal data protection.

The primary objective of this Privacy Policy is to ensure an adequate level of protection of privacy of the Portal Users at a level at least equivalent to the standards set out in applicable regulations, in particular the Act of 18 July 2002 on the provision of services by electronic means (“**Act**”) and 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 (“**GDPR**”) as well as the Act of 16 July 2004 – Telecommunications Law (“**Telecommunications Law**”).

Links may be placed in the Portal allowing the User to directly access websites other than the Portal. In relation to such websites, the Portal Owner states that it is not responsible for the privacy policy applied by the administrators of such websites.

The manner and scope of collecting other data and information not related to the technical aspects of the Portal’s operation will be determined by separate arrangements – appropriate to their intended use and published in an adequate form.

### **I. PERSONAL DATA PROCESSING**

1. The Controller of the Portal Users’ data collected and processed in connection with the use of the Portal and the operation and functioning of the Portal is the Portal Owner, i.e. WFC Investments sp. z o.o. with its registered office in Warsaw.
2. During the use of the Portal, the Portal Owner automatically collects information on the interaction with the Portal or individual services available through the Portal, including system logs containing:
  - a) date, time of the visit and IP of the device from which the connection was made,
  - b) domain name,
  - c) browser type,
  - d) operating system type,
  - e) information on website viewing statistics.
3. In the event of receiving an inquiry from the User (e.g. in the event of submitting an offer to lease office space in the Warsaw Financial Center building) and in connection with the processing by the Portal Owner of a complaint submitted in connection with the operation of the Portal, the Portal Owner processes the email address from which such inquiry or complaint was sent to the Portal Owner.

4. Personal data processed by the Portal Owner do not include special categories of personal data within the meaning of Article 9(1) of the GDPR or data concerning criminal convictions and offences within the meaning of Article 10 of the GDPR.
5. Personal data of the Portal Users will be processed by the Portal Owner only for the following purposes:
  - a) for purposes related to the implementation of particular Portal functionalities in connection with the use of the Portal and for the proper administration of the Portal, including the generation of relevant statistics. Personal data of the Portal Users will be processed by the Portal Owner pursuant to Article 6(1)(f) of the GDPR, i.e. for the purposes of the legitimate interests understood as the technical provision of the Portal and the monitoring of its operation, optimization and adjustment of the Portal functionality to the needs and requirements of the Portal Users and providing the Portal Users with the possibility to use other interactive functions of the Portal. Personal data will be processed during the period in which the Portal is used by the User.
  - b) in order to provide Portal Users with the possibility of contacting dedicated email addresses published on the Portal pursuant to Article 6(1)(f) of the GDPR, i.e. for the purposes of the legitimate interests understood as accepting an inquiry to the email address made available on the Portal (in particular in order to ensure contact with the User in the event of submitting an offer to lease office space in the Warsaw Financial Center building and in the event of the Portal Owner's processing of data contained in a complaint submitted in connection with the operation of the Portal), and to respond to such an inquiry. Personal data will be processed for the period necessary to respond to the User's enquiry.
6. Personal information may be transferred to Canada. In this case, the Portal Owner will apply the appropriate legal safeguards referred to in Article 45 of the GDPR as the Canadian legal system complies with the requirements of European Union law, i.e. the data are transferred pursuant to the Commission Decision finding an adequate level of protection – Commission Decision of 20 December 2001 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data provided by the Canadian Personal Information Protection and Electronic Documents Act (2002/2/EC) (Official Journal L 002, 04/01/2002 P. 0013–0016), also available at: <https://eur-lex.europa.eu/legal-content/PL/TXT/HTML/?uri=CELEX:32002D0002&from=en>.
7. In connection with the processing of personal data by the Portal Owner, each data subject has the right:
  - a) to access the content of their personal data, i.e. the right to obtain confirmation whether the Portal Owner processes data and information concerning such processing and to receive a copy thereof
  - b) to rectify the data if the data processed by the Portal Owner are incorrect or incomplete

- c) to request that the data be erased by the Portal Owner
- d) to request that the data processing be restricted by the Portal Owner
- e) to data portability, i.e. the right to receive personal data delivered to the Portal Owner and to send them to another controller
- f) to object to the processing of data
- g) to lodge a complaint with the President of the Personal Data Protection Office or with the supervisory authority of another Member State of the European Union competent for the place of habitual residence or work of the data subject or for the place of alleged infringement of the GDPR
- h) to withdraw consent (if processing is based on consent) at any time (without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal).

8. The Portal Owner does not process personal data in an automated way.

## **II. COOKIES**

1. Cookie files (the so-called “cookies”) are IT data, in particular text files, which are stored in the terminal device of the Portal User and are intended for the use of the Portal. Cookies usually contain the name of the website that they come from, the length of time they are stored on the terminal device and a unique number.
2. Entities placing cookies on the terminal device of the Portal User and gaining access to them are the Portal Owner and entities indicated in part II(8) of the Privacy Policy.
3. Cookies are used for the following purposes:
  1. optimization and adjustment of the Portal’s functionality to the needs and requirements of Users; in particular, cookies make it possible to recognize the User’s device and display the Portal appropriately on the User’s device in a manner adapted to the User’s individual needs;
  2. generating appropriate statistics on the use of the Portal by Users.
4. Two types of cookies may be used within the scope of functioning of the Portal:
  1. Session cookies, which are temporary files stored in the User’s terminal device until logging out, leaving the website or disabling the software (web browser); and
  2. Permanent cookies (persistent cookies), which are stored in the User’s terminal device for the time specified in the parameters of cookies or until their removal by the User.
5. The following types of cookies may be used within the scope of functioning of the Portal:

1. the strictly necessary cookies, enabling the use of services available within the Portal, e.g. authenticating cookie files used for services requiring authentication within the Portal;
  2. cookies used to ensure security, e.g. used to detect authentication abuse within the Portal;
  3. performance cookies, which make it possible to collect information on the use of the Portal's pages;
  4. functional cookies, which make it possible to "remember" the settings selected by the User and to personalize the User's interface, e.g. within the scope of the selected language or region from which the User originates, font size, appearance of the website, etc.
6. Each User can decide for themselves how cookies are stored on their terminal device. This is allowed by the settings/preferences specified in web browsers. These settings may be changed in particular in such a way as to block the automatic handling of cookies in the settings of the internet browser or inform the User each time that they have been placed in the User's device. Detailed information on the possibilities and methods of handling cookies are available in the settings of the internet browser software.

Below you will find links to information about cookie settings in the most popular web browsers:

- [Firefox](#)
- [Opera](#)
- [Internet Explorer](#)
- [Chrome](#)
- [Safari](#)

7. Limitations on the use of cookies may affect some of the functionalities available on the Portal.
8. Cookies placed in the User's terminal device may also be used by advertisers and other partners cooperating with the Portal Owner. Detailed information on the cookies used in the Portal is available below.

| <b>Name</b> | <b>Time</b> | <b>Source</b>   | <b>Objective</b>   |
|-------------|-------------|---|--------------------|
| PHPSESSID   | session     | wfc.pl  | strictly necessary |
| _ga         | 2 years     | <a href="https://www.google-analytics.com/analytics.js">https://www.google-analytics.com/analytics.js</a> | stats              |
| _gat        | 1 day       | <a href="https://www.google-analytics.com/analytics.js">https://www.google-analytics.com/analytics.js</a> | stats              |

|                       |         |  |  |
|-----------------------|---------|--|--|
| _gid                  | 1 day   | <a href="https://www.google-analytics.com/analytics.js">https://www.google-analytics.com/analytics.js</a>  | stats  |
| ads/ga-audiences      | session | <a href="https://www.google.ie/ads/ga-audiences?v=1aip=1t=sr_r=4tid=UA-26351984-11cid=1845049023.1572449635jid=1638613766_v=j79z=1860838670slf_rd=1random=2504695326">https://www.google.ie/ads/ga-audiences?v=1aip=1t=sr_r=4tid=UA-26351984-11cid=1845049023.1572449635jid=1638613766_v=j79z=1860838670slf_rd=1random=2504695326</a><br>via <a href="https://www.google-analytics.com/analytics.js">https://www.google-analytics.com/analytics.js</a>   | marketing  |
| IDE                   | 1 year  | <a href="https://www.googleadservices.com/pagead/conversion.js">https://www.googleadservices.com/pagead/conversion.js</a>  | marketing  |
| pagead/1p-user-list/# | session | <a href="https://www.google.ie/pagead/1p-user-list/920825970/?random=1572449668420cv=9fst=157244760000num=1guid=ONu_h=768u_w=1024u_ah=768u_aw=1024u_cd=24u_his=2u_tz=0u_java=falseunplug=3u_nmime=4sendb=1frm=0url=https%3A%2F%2Fwfc.pl%2Fref=https%3A%2F%2Fwfc.pl%2Ftiba=WFC%20Warsawfmt=3is_vtc=1random=2476109120resp=GooglemKTybQhCsO_rmt_tld=1ipr=y">https://www.google.ie/pagead/1p-user-list/920825970/?random=1572449668420cv=9fst=157244760000num=1guid=ONu_h=768u_w=1024u_ah=768u_aw=1024u_cd=24u_his=2u_tz=0u_java=falseunplug=3u_nmime=4sendb=1frm=0url=https%3A%2F%2Fwfc.pl%2Fref=https%3A%2F%2Fwfc.pl%2Ftiba=WFC%20Warsawfmt=3is_vtc=1random=2476109120resp=GooglemKTybQhCsO_rmt_tld=1ipr=y</a><br>via <a href="https://www.googleadservices.com/pagead/conversion.js">https://www.googleadservices.com/pagead/conversion.js</a> | marketing  |
| test_cookie           | 1 day   | <a href="https://www.googleadservices.com/pagead/conversion.js">https://www.googleadservices.com/pagead/conversion.js</a>  | marketing  |
| setuki_sid            | 99 days | wfc.pl   | necessary for the operation of the CMS application |

### III. CHANGE MODE

1. The Portal Owner undertakes to regularly review this Privacy Policy and change it in case it is necessary or desirable due to: new legal regulations, new guidelines of authorities responsible for the supervision of personal data protection processes, best practices in the field of personal data protection.

2. The Portal Owner also reserves the right to change this Privacy Policy in the event of changes in the technology used to process personal data, as well as in the event of changes in the ways, purposes or legal grounds for the processing of personal data by the Portal Owner.
3. The changed Privacy Policy comes into force upon its publication on the Portal.

#### **IV. CONTACT**

You are welcome to ask questions as well as make comments and requests regarding this Privacy Policy. Please send them in electronic form to the following email address: [info@wfc.pl](mailto:info@wfc.pl)