

Privacy Policy

The following Privacy Policy sets forth **the rules for storing and accessing data on the Devices of Users using the Service** for the purpose of providing electronic services by the Administrator, as well as **the rules for collecting and processing the personal data of Users** provided by them personally and voluntarily through the tools available on the Service.

The following Privacy Policy is an integral part of the [Terms of Service](#), which sets forth the rules, rights and obligations of Users using the Service.

§1 Definitions

- **Service** - the website of "Sensei Poland " operating at <https://sensei-air.pl>
- **External service** - websites of partners, service providers or service recipients cooperating with the Administrator
- **Administrator of the Service / Data** - The Administrator of the Service and the Administrator of the Data (hereinafter referred to as the Administrator) is the company "Sensei Poland", conducting business at the following address: Al. KEN 36 / 112B, WARSAW, with assigned tax identification number (NIP): 5252920760, with assigned KRS number: 0000988522, providing services electronically through the Service.
- **User** - a natural person for whom the Administrator provides electronic services through the Service.
- **Device** - an electronic device with software through which the User accesses the Site
- **Cookies** - text data collected in the form of files placed on the User's Device.
- **RODO** - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 on the basis of an identifier such as a name, an identification number, location data, an online identifier or 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 performed on personal data or sets of personal data in an automated or non-automated manner, such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, viewing, using, disclosing by transmission, dissemination or otherwise making available, matching or linking, limiting, erasing or destroying;
- **Restriction of processing** - means the marking of stored personal data in order to limit its future processing
- **Profiling** - means any form of automated processing of personal data that involves the use of personal data to evaluate certain personal factors of an individual, in particular to analyze or forecast aspects of that individual's performance, economic situation, health, personal preferences, interests, reliability, behavior, location or movement
- **Consent** - consent of the data subject means a voluntary, specific, informed and unequivocal demonstration of will by which the data subject, in the form of a statement or explicit affirmative action, consents 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, modification, unauthorized disclosure of or unauthorized access to personal data transmitted, stored or otherwise processed
- **Pseudonymization** - 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 stored separately and is covered by technical and organizational measures preventing its attribution to an identified or identifiable natural person
- **Anonymization** - Data anonymization 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

The Administrator has appointed a Data Protection Supervisor, who is Sergiy Krylov.

The Inspector can be contacted via e-mail address: info@sensei-europe.com, by phone at +48 22 230 42 22 or in writing by writing to Smulikowskiego 4A/16, Warsaw, 00-389.

The Data Protection Inspector can be contacted on all matters concerning the processing of personal data.

§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's Device by the ICT systems of External Services. The scripts of External Services that can place Cookies on User Devices have been knowingly placed on the Site through scripts and services made available and installed on the Site
- **Session cookies** - files placed and read from the User Device by the Service during a single session of a given Device. When the session ends, 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 the Device session unless the configuration of the User Device is set to delete cookies after the end of the Device session.

§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 Internet browsers and do not allow the downloading of other data from the User's Device or data of other websites visited by the User, including personal data or confidential information. Transfer of viruses, Trojan horses and other worms to the User Device is also practically impossible.
- **Internal cookies** - the cookies used by the Administrator are safe for the Users' Devices and do not contain scripts, content or information that may compromise the security of personal data or the security of the Device used by the User.
- **External cookies** - The Administrator makes all possible efforts to verify and select service partners in the context of Users' security. The Administrator selects well-

known, large partners with global public trust for cooperation. However, it does not have full control over the content of cookies from external partners. The Administrator is not responsible for the security of Cookie files, their content and their use in accordance with the license by the Scripts installed in the service, coming from external Services, as far as the law allows. The list of partners is provided later in the Privacy Policy.

- **Cookie control**
 - The user can at any time, independently change the settings for the storage, deletion and access to data stored cookies by each website
 - Information on how to disable cookies in the most popular computer browsers is available at: [how to disable cookies](#) or from one of the designated providers:
 - [Managing cookies in the Chrome browser](#)
 - [Managing cookies in the Opera browser](#)
 - [Managing cookies in the FireFox browser](#)
 - [Managing cookies in the Edge browser](#)
 - [Managing cookies in the Safari browser](#)
 - [Managing cookies in Internet Explorer 11](#)
 - The User may, at any time, delete any cookies stored to date using the tools of the User's Device through which the User accesses the Website's services.
- **Threats on the side of the User** - The Administrator 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 activities of the User. The Administrator is not responsible for the 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 was infected. Users, in order to protect themselves from these threats, should follow the [recommendations for safe use of the Internet](#).
- **Storage of personal data** - The Administrator ensures that it makes every effort to ensure that the processed personal data entered voluntarily by Users are secure, access to them is limited and carried out in accordance with their purpose and the purposes of processing. The Administrator also ensures that it makes every effort to secure the data it holds against loss, through the use of appropriate physical as well as organizational safeguards.

§5 Purposes for which cookies are used

- Streamline and facilitate access to the Service
- Personalization of the Service for Users
- Enabling Login to the Service
- Marketing, Remarketing in external services
- Ad serving services
- Affiliate services
- Keeping statistics (users, number of visits, types of devices, link, etc.).
- Serving multimedia services
- Providing community services

§6 Purposes of personal data processing

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

- Realization of electronic services:
 - Services of registration and maintenance of the User's account on the Website and functionalities related to it
 - Newsletter services (including sending advertising content with permission)
 - Services for sharing information about the content posted on the Site on social networks or other sites.
- Administrator's communication with Users on matters related to the Service and data protection
- To ensure the legitimate interest of the Administrator

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

- Keeping statistics
- Remarketing
- Serving ads tailored to Users' preferences
- Support for affiliate programs
- To ensure the legitimate interest of the Administrator

§7 Cookies of External Services

The Administrator on the Website uses javascript and web components of partners that may place their own cookies on the User's Device. Remember that in your browser settings you can decide for yourself about the allowed cookies that can be used by particular websites. Below is a list of partners or their services implemented on the Website that may place cookies:

- **Multimedia services:**
 - [YouTube](#)
- **Social/connected services:**
(Registration, Login, content sharing, communication, etc.).
 - [Twitter](#)
 - [Facebook](#)
 - [Google+](#)
- **Content sharing services:**
 - [WhatsApp](#)
 - [Instagram](#)
- **Newsletter Services:**
 - [GetResponse](#)
- **Keeping statistics:**
 - [Google Analytics](#)

Services provided by third parties are beyond the control of the Administrator. 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 Service 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 Service.

Anonymous data collected automatically:

- IP address
- Browser type
- Screen resolution
- Approximate location
- Openable subpages of the website
- Time spent on the relevant subpage of the website
- Type of operating system
- Previous subpage address
- Address of the referring page
- Browser language
- Internet connection speed
- Internet service provider

Data collected during registration:

- First name / last name / nickname
- E-mail address
- Address of residence
- Phone number
- IP address (collected automatically)
- Other ordinary data

Data collected when signing up for the Newsletter service

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

Data collected when adding a comment

- Name / nickname
- E-mail address
- Web address
- IP address (collected automatically)

Part of the data (without identifying information) may be stored in cookies. Part of the data (without identifying data) may be transferred 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 Administrator. Data collected as part of the services provided are not transferred or resold to third parties.

Access to the data (most often on the basis of a Data Processing Entrustment Agreement) may have entities, responsible for maintaining the infrastructure and services necessary to run the service, i.e.:

- Hosting companies, providing hosting or related services to the Administrator
- Companies through which the Newsletter service is provided

Entrustment of personal data processing - Newsletter

The Administrator, in order to provide the Newsletter service, uses the services of a third party service provider - [GetResponse](#), . The data entered in the newsletter subscription form is transferred, stored and processed in the third-party service of this service provider.

Please be advised that the indicated partner may modify the indicated privacy policy without the consent of the Administrator.

Entrustment of personal data processing - Hosting, VPS or Dedicated Server Services

The Administrator, in order to run the site, uses an external provider of hosting, VPS or Dedicated Servers - **OVH sp. z o.o.**