

# Privacy policy of the companies of the Integer.pl SA Capital Group (ochrona-danych-osobowych)

in force from June 14, 2018 (as version 1.1)

The protection of your personal data is very important to us. When providing postal services, we are obliged to maintain postal secrecy, which includes, among others, information provided in postal items, data on entities using postal services and data on the fact and circumstances of providing postal services or using these services. In addition, information or data covered by postal secrecy may be collected, recorded, stored, processed, changed, deleted or made available only if these activities relate to the postal service provided or are necessary for its performance or separate provisions provide otherwise.

In many cases, your personal data within the meaning of generally applicable laws is also covered by postal secrecy. This document is to provide you with the necessary information on how we process your personal data and what your rights are in relation to the processing of your personal data.

## Who is the administrator of your personal data?

The administrator of your data is, depending on the type of service provided, the relevant company related by capital with Integer.pl SA (list of these entities is available at: <https://integer.pl/en/grupa-kapitalowa-integer-pl/profil> (<https://integer.pl/pl/grupa-kapitalowa-integer-pl/profil-dzialalnosci>) - activities (<https://integer.pl/pl/grupa-kapitalowa-integer-pl/profil-dzialalnosci>) - in the further part of this information, these entities will be defined collectively as "InPost") or an external entity that provided data to InPost for the purpose and scope of the service, in particular:

- If you are a natural person sending his parcel as part of the postal or transport services provided via InPost parcel lockers - the administrator of your data is InPost Paczkomaty sp. z o. o. With the registered office at ul. Wielicka 28, 30-552 Krakow.
- If you are a natural person giving your parcel as part of the courier services provided by InPost - the administrator of your data is InPost Ekspres sp. z oo, with its registered office at ul. Wielicka 28, 30-552 Krakow.
- If you outsource service to the shipment to be sent via InPost Express sp. z o.o. or parcel machine InPost Paczkomaty sp. z oo (eg if you order goods in the online store, indicating your delivery details) - the administrator of your personal data is the external entity (eg online store) who ordered InPost to perform the service on such a shipment as its sender.

Always in a situation where you give us permission to process your personal data, you will be informed, prior to giving your consent, which company from among InPost companies is the administrator of your personal data.

## What personal data do we process?

As part of the services provided by InPost, we process the following personal data:

- the name and surname of the sender (including the payer) and the recipient (recipient) of the consignment,
- sender's address (street, house number, apartment number, zip code, city),
- address of the consignee (street, house number, apartment number, zip code, city),

- a new address for delivery of the parcel, if the shipper issues InPost with the order to deliver it to the new address, or InPost will agree with the Recipient before delivery of the parcel another address (the new address contains data in the form of street, house number, apartment number, postal code and locality),
- e-mail address of the sender and recipient of the parcel, which is processed in order to send messages regarding the service, in particular information on the current status of delivery of the parcel, or information enabling the parcel delivery from the parcel machine,
- the telephone number of the sender and the recipient of the shipment in order to directly contact or send messages regarding the service, in particular contact to establish a different place of delivery of the parcel, or information enabling the parcel delivery from the parcel machine,
- depending on the service chosen for the service, we can also process the bank account number necessary to transfer the collected cash (as part of the cash on delivery service) to the person designated by the sender, and information to identify the circumstances of payment of downloads or top-ups of accounts as part of payment our pre-paid services (prepayment),
- the IP address of people who use our systems to order the services we provide.

We process the above data to the extent and scope necessary to perform the services provided by InPost and to comply with InPost legal obligations, including consideration of complaints submitted for these services.

In addition, as part of providing you with marketing messages or other requests, such as requests for proposals (with your prior consent), we may process your personal data that you provided to us when giving your consent.

Providing personal data by you is voluntary, but necessary for the provision of services provided by InPost or consideration and possible implementation of applications that you address to us. The requirement to provide these data is a contractual requirement, whereas in relation to data provided in the framework of complaints submitted to us due to non-performance or improper performance of postal and transport services, it is also a statutory requirement (specified in the implementing provisions of the Postal Law and Transport Law Act).

In addition, because - for the purposes of security and protection of you and your shipments, in particular against theft and vandalism - we use monitoring of InPost parcel lockers, under which it is possible to record your image, and thus also process this personal data. Such processing of your data is therefore necessary not only for the protection of our legitimate interests, but also for the protection of your interests, and in the event that such a record immortalizes the crime, this processing is also necessary to fulfill the obligation that arises from us, resulting in particular from art. 81 of the Postal Law Act (Dz.U.2017.1481, as amended) and art. 304 of the Code of Criminal Procedure (Dz.U.2017.1904 i.e. as amended).

## How do we receive your personal information?

We receive your personal data directly from you, or from the sender (including the payer) of the parcel, which he sent by ordering InPost to perform the service on such a shipment. This data can therefore be obtained by InPost in the following circumstances:

- in the case where you forward your Shipment to us, so that we can deliver it to the person indicated by you or to the place indicated,
- in the case where our clients (eg online stores) provide us with your data in order to deliver parcels to you,
- in the case where you file a complaint or complaint for non-performance or improper performance of the services we provide, or if your data is provided by a person entitled to submit such a complaint, for example our client who sent you a parcel, then to InPost a complaint for non-performance or improper performance of the service on this parcel,
- in the case where you submit to us another inquiry regarding the services or activities of InPost provided by InPost,
- if you provide InPost with your details to receive an InPost offer,
- if you provide InPost with your data to create an account in the InPost IT system that allows you to generate orders for the services we offer,
- if you provide your data - only with your consent - for processing for marketing of InPost products and services and entities cooperating with InPost, which will be implemented by InPost or independently by these entities

## For what purpose do we process your personal data?

The purpose of processing your personal data is specified in particular in the relevant agreement or InPost regulations, under which we provide services for you or we have access to your personal data, or directly when you consent to the processing of your personal data. Such a goal can be:

- making on your behalf postal services or transport services, and services accompanying these services, including delivery of the parcel you sent, or delivery of the parcel to you,
- the necessity of our tax, legal and billing obligations,
- providing you with information and marketing materials or to provide you with our offer (this is optional and requires your consent to receive this type of information).
- analysis, including personalization, solely for the purpose of process optimization in the provision of services and improvement of their services.

## How long do we keep your personal data?

We store your personal data no longer than necessary. In particular, we store these data for the time necessary for the proper performance of the services we provide, and after this period no longer than until the expiration of the claims that may be raised in connection with the provision of these services. The duration of personal data storage is specified in our terms of service provision, contracts for entrusting data processing (then this time binds Parties to these contracts), content of your consent to the processing of your personal data, and if it is not specified in these terms and conditions, we store your personal data in the following periods:

- if you have an account in our systems that allow you to order the services we provide, and you assign these services as a sender (including payer), as well as if you do not have such an account, but you use our services as a sender (including payer), we store your personal data for a maximum period of 6 years from the date of sending a given parcel to you,
- when you are the recipient of the parcel, we store your personal data for a maximum period of 18 months from the date of shipment, and after this time we may store this data for a period not longer than the period of prescription of any claims for services we provide applicable laws,
- when you file a complaint or a complaint about services provided by InPost, your personal data contained in this complaint or complaint is processed for the time necessary to consider the complaint and complaint, and after this time we can store it for a period not longer than the period of prescription of possible claims due to a complaint lodged or complaint, resulting from generally applicable provisions of law,
- when you submit another request or inquiry to us, we store your personal data for the period of service and possible implementation of your application, and after this period we may store it for a period not longer than the period of possible limitation of claims resulting from generally applicable law,
- if the storage time of your personal data results from the mandatory provisions of law, we store your personal data for the period specified in these regulations.

## Why do we keep your data for such a period of time?

Because as InPost, we must comply with the obligations arising from the provisions of the generally applicable law, including in particular:

- implementation of postal law, transport law, tax and accounting regulations,
- to the extent that the processing of personal data is necessary for the purposes resulting from legally justified interests pursued by InPost, in the form of matters related to pursuing claims arising from the provision of services by InPost,
- constant improvement of the level of security, in particular prevention of fraud and fraud,
- other legitimate obligations imposed on InPost.

## How do we process your personal information?

In the area of postal and transport services provided by InPost, we process your personal data:

- in electronic form in InPost IT systems and InPost subcontractors. to the extent necessary for the proper

implementation of services provided by InPost, also in an automated manner,

- in a physical form (eg in writing), to the extent necessary for the proper implementation of services provided by InPost, in particular as printouts on transmission labels generated through InPost IT systems that are glued to the shipment.

When processing your personal data, we use security measures appropriate to the type, quantity and scope of personal data being processed, and appropriate organizational and technical measures to best protect your personal data against unauthorized activities.

Being aware of the importance of protecting your personal data, we use, among others:

- encrypting your data using the Secure Sockets Layer (SSL) layer during transmission,
- in certain cases, the processes of anonymisation, pseudonymisation and encryption of your personal data
- other hardware, network and system security features, such as firewalls, licensed anti-virus software, hardware and network, controlled access via a secured VPN network and many other IT security solutions,
- electronic and physical mechanisms of access control of people to buildings and rooms where personal data are processed (including magnetic and electronic keys, security locks, monitoring),
- other security measures that are designed to protect your personal data.

## What are the contact details of the Personal Data Administrator and the person responsible at the Administrator for the protection of personal data?

Contact details of InPost: ul. Wielicka 28, 30-552 Krakow. Contact with the person responsible for the protection of personal data in InPost is possible at the following e-mail address:

dane\_osobowe@grupainteger.pl (mailto:dane\_osobowe@grupainteger.pl) , or traditional correspondence to the address given above.

If you have any questions or concerns regarding the protection of your personal data, you can contact us via the following e-mail address: dane\_osobowe@grupainteger.pl (mailto:dane\_osobowe@grupainteger.pl) .

## What are the legal grounds for the processing of your personal data by InPost?

InPost processes your personal data in particular to provide postal and transport services that it offers. These services are performed on the basis of contracts, including contracts concluded with shippers. Without the processing of these personal data, we are unable to provide these services (eg without knowing the address for delivery of the parcel and its addressee, we are unable to deliver such a shipment), or other services to which we have committed. The processing of your personal data is also necessary for the fulfillment of legal obligations imposed on us. One of such duties is the one specified in art. 81 of the Postal Law Act (Dz.U.2017.1481, ie with later changes) – in accordance with this provision, InPost, acting as a postal operator, is obliged to perform tasks and duties for defense,

We also process your personal data for purposes arising from our legitimate interests – by "legally legitimate interest" we mean compliant with generally applicable law and a reasonable purpose of data processing (eg direct marketing of our products or services, or claims for our business business). Whenever we want to process your personal data based on a legitimate interest, we investigate and assess whether such processing of personal data will affect you and your rights. We will not process your personal data on the basis of our "legitimate interest" if your interest or your rights and freedoms override it.

For other purposes of processing your personal data, your consent to the processing of your personal data for these purposes may be withdrawn at any time without affecting the validity of the processing of personal data prior to the withdrawal of consent. Your consent is obtained especially for the use of your personal data for marketing purposes.

## Who is the recipient of your personal data?

In accordance with the provisions of the RODO, the "recipient" of personal data is a natural or legal person, public body, entity or other entity to whom personal data are disclosed, regardless of whether it is a third party. Your personal data is not processed solely by InPost and its staff. We provide our services with the help of many subcontractors, ranging from transport companies, and ending with entities that run post offices for us and issue parcels for you in them. Your data is therefore processed by such categories of recipients as:

- employees and co-workers of InPost,
- Subcontractors of InPost, rendering on our behalf services of receiving, moving, sorting and delivering parcels,
- an insurer removing damage on shipments,
- subcontractors operating our IT networks and databases and creating IT solutions for us and providing marketing services to us,
- subcontractors serving for InPost helpline and customer service department,
- companies related by capital with Integer.pl SA (list of these entities is available at: <https://integer.pl/en/grupa-kapitalowa-integer-pl/profil-dzialalnosci> (<https://integer.pl/pl/grupa-kapitalowa-integer-pl/profil-dzialalnosci>)),
- professional entities providing InPost with tax, legal, audit and billing consultancy.

We conclude confidentiality and personal data processing agreements with entities that process your personal data in a manner that is consistent with the provisions of generally applicable law in the field of personal data protection and on conditions to ensure the security of processing your personal data and provide them with appropriate powers of attorney.

In addition, by virtue of the obligation set out in art. 81 of the Postal Law Act (Dz.U.2017.1481, ie with later amendments), recipients of your personal data specified in this provision may be public authorities and state services, eg the President of the Office of Electronic Communications, which controls postal activity.

## Is your personal data transferred to third countries, i.e. countries that do not belong to the European Economic Area?

Your personal data are transferred to third countries in the case where the services provided by InPost are to be carried out also in the territory of a third country. This is the case, for example, when you send a parcel via InPost to such a country. Your personal data may also be passed on to our subcontractors (eg entities that deliver your parcel to a third country) and to tax payers, legal, audit and settlement entities in InPost if they conduct their activities in a third country. With each of the above cases we secure the processing of your personal data, in particular by entering into confidentiality agreements and processing personal data in a manner that which is compliant with the provisions of generally applicable law in the European Union and Poland in the field of personal data protection and on conditions to ensure the security of processing your personal data. We do not pass your personal data to international organizations. We do not transfer your personal data to third countries, if such transfer is not possible or is excluded under generally applicable law.

## Cookies

If you use our websites and systems available through these websites (in particular enabling the generation of orders and other activities related to the ordering of postal and transport services), when browsing these pages, so-called "cookies" (cookies) are created. These are small-sized text files that are stored on your device through which you browse web pages. They are widely used to ensure the functioning of websites and other services provided via the Internet, and to improve and develop these websites, which is based on reading the contents of these files.

InPost collects information contained in "cookies", such as the date of connection to the website or the IP address of the device from which the website is connected - these are the data showing how you use our websites. This information is used for administrative and statistical purposes and aimed at improving these pages and improving your comfort of use. In addition, these data, processed automatically, can be used to analyze the behavior of recipients of content on these websites (eg time spent on the website) or to

personalize the content of websites, in particular by providing online advertising.

You do not need to accept cookies (you can accept their use either by selecting the appropriate button on our website, as well as by making the appropriate settings in your web browser), but it may cause that this website will not work properly.

## What are your rights regarding access to your personal data?

You have the right to request from InPost, as an administrator of personal data, access to your personal data, rectification, deletion or limitation of processing, as well as the right to object to their processing, and the right to transfer these data and receive copies thereof.

If you have agreed to the processing of your data by InPost, you have the right to withdraw your consent at any time, without affecting the legality of the processing, which was made on the basis of consent before its withdrawal.

The above rights may be exercised by submitting an appropriate InPost statement, in particular and via the e-mail address: dane\_osobowe@grupainteger.pl (mailto:dane\_osobowe@grupainteger.pl).

You also have the right to lodge a complaint with the supervisory body (the President of the Office of Personal Data or another state authority obliged by law to supervise the processing of personal data), if you feel that we have not adequately addressed our obligations.

**This policy may be subject to change, in particular if it is necessary due to a change in the general provisions of law or a change in the scope of services offered by InPost. The current version of the policy is available at: <https://inpost.pl/ochrona-danych-osobowych> (<https://inpost.pl/ochrona-danych-osobowych>).**

### CONSIGNMENT

- TRACKING THE PACKAGE (/SLEDZENIE-PRZESYLEK)
- SEND THE PACKAGE (HTTPS://MANAGER.PACZKOMATY.PL/ZALOGUJ)

### LOCATE

- PACZKOMAT (/ZNAJDZ-PUNKT-INPOST)
- PARCEL HANDLING POINT (/ZNAJDZ-PUNKT-INPOST)

### REPORT

- RETURN (HTTPS://SZYBKIEZWROTY.PL/)
- COMPLAINTS (/KONTAKT/ZLOZ-REKLAMACJE)

### CUSTOMER SERVICE

- CONTACT (/KONTAKT)
- HELP (/POMOC)

**f** (<https://www.facebook.com/paczkomaty/>)

**t** (<https://twitter.com/paczkomatypl>)

**in** (<https://www.linkedin.com/company/inpost>)



(<https://www.youtube.com/channel/UCAzk7yw8Tzd76EmCRIMB-gA/videos>)

helpline

For mobile phones

**722 444 000 (tel:722444000)**

For landlines

**801 400 100 (tel:801400100)**

**Helpline hours:**

Mon. - pt. 7:00 - 22:00,

Sat. 8:00 - 20:00,

Sundays and holidays 8:00 - 16:00 (for the parcel locker service)

**PRICE LISTS AND REGULATIONS (/DLA-CIEBIE/CENNIK)**

Price list for individual clients (/cennik-paczkomaty-kurier-przesylki)

Price list for companies (/dla-firm-cennik-paczkomaty-kurier-przesylki)

regulations (/regulaminy)

**ADVERTISING WITH INPOST (/DLA-FIRM-REKLAMA-INPOST)**

Advertising on parcel lockers (/dla-firm-reklama-na-paczkomatach)

Large format advertising (/dla-firm-reklama-wielkopowierzchniowa)

Advertisement on the screens of Parcel Machines (/dla-firm-reklama-na-ekranach-paczkomatow)

Sampling products (/dla-firm-reklama-samplingi)

Commercial mailings (/dla-firm-reklama-mailingi)

InPost **for you** (/)

paczkomaty (/paczkomaty-odbior-nadanie)

Courier (/kurier-przesylki-kurierskie)

Allegro InPost (/allegro-przesylki)

Quick Returns (/szybkie-zwroty)

Price list (/cennik-paczkomaty-kurier-przesylki)

regulations (/regulaminy)

InPost **for Business** (/dla-firm)

**OFFER FOR BUSINESS AND E-COMMERCE (/DLA-FIRM-PACZKOMATY-KURIER)**

Standard courier (/dla-firm-kurier)

Paczkomaty for business (/dla-firm-paczkomaty)

Integration of an online store (/dla-firm-integracja-inpost)

Quick Returns (/klient-biznesowy-program-szybkie-zwroty)

Outsourcing of distribution (/dla-firm-dystrybucja)

**OFFER FOR ALLEGRO SELLERS (/DLA-FIRM-ALLEGRO-PRZESYLKI)**

Allegro Kurier InPost (/dla-firm-allegro-kurier-inpost)

Allegro Parcel Lockers InPost (/dla-firm-allegro-paczkomaty-inpost)

Allegro MiniPaczka InPost (/dla-firm-allegro-minipaczka-inpost)

Consignment items (/dla-firm-allegro-pobranie)

Returns Allegro InPost (/dla-firm-oferta-allegro-zwroty-allegro-inpost)

privacy policy (/ochrona-danych-osobowych)

Site map (/)

Copyright © 2018 InPost SA All rights reserved.