

# Privacy policy and cookies policy of the [medcourses.com](https://medcourses.com)

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## 1. General provisions

- 1.1. This Privacy Policy primarily contains information and describes the rules governing the processing of personal data by the Controller within the Online Portal, including the legal basis, purposes, and period of processing of personal data, the rights of data subjects, as well as information on the use of cookies and analytical tools in the Online Portal.
- 1.2. The controller of personal data collected via the Online Portal is Bethink Sp. z o.o. with its registered office in Poznań (registered office and address for service: ul. Ułańska 3, 60-748 Poznań); entered in the Register of Entrepreneurs of the National Court Register under KRS no. 0000668811; the registration court where the company's documentation is kept: the District Court Poznań – Nowe Miasto i Wilda in Poznań, 8th Commercial Division of the National Court Register; Tax Identification Number (NIP): 7811943756; REGON: 366802351; e-mail address: [info@medcourses.com](mailto:info@medcourses.com) – hereinafter referred to as the “Controller”, who is also the Service Provider.
- 1.3. The Controller has appointed a Data Protection Officer, who may be contacted at: [dpo@bethink.com](mailto:dpo@bethink.com).
- 1.4. Personal data in the Online Portal are processed by the Controller in accordance with applicable laws, in particular 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 (General Data Protection Regulation) – hereinafter referred to as the “GDPR” or the “GDPR Regulation”. The official text of the GDPR is available at: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>

- 1.5. Use of the Online Portal, as well as providing Users’ personal data to the Portal, is voluntary.
- 1.6. The Controller makes every effort to protect the interests of the individuals whose personal data it processes and, in particular, is responsible for and ensures that the data collected by it are: (1) processed lawfully; (2) collected for specified, lawful purposes and not further processed in a manner incompatible with those purposes; (3) factually correct and adequate in relation to the purposes for which they are processed; (4) stored in a form which permits identification of the data subjects for no longer than is necessary to achieve the purposes of processing; and (5) processed in a manner ensuring appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, through appropriate technical or organisational measures.
- 1.7. Taking into account the nature, scope, context, and purposes of processing, as well as the risk of infringement of the rights or freedoms of natural persons of varying likelihood and severity, the Controller implements appropriate technical and organisational measures to ensure that processing is carried out in accordance with the GDPR and to be able to demonstrate this. These measures are reviewed and updated where necessary.
- 1.8. The Controller applies technical measures preventing unauthorised persons from obtaining and modifying personal data transmitted electronically.

## 2. Definitions

- 2.1. **ONLINE PORTAL** – the Service Provider’s website available at: <https://medcourses.com/>
- 2.2. **NEWSLETTER** – an Electronic Service available within the Portal; an electronic distribution service provided by the Service Provider via electronic means of communication, enabling the receipt of periodic content containing marketing information about new items and updates concerning the Service Provider, its partners and the Online Portal, as well as topics related thereto.
- 2.3. **USER** – (1) a natural person with full legal capacity and, in cases provided for by generally applicable laws, also a natural person with limited legal capacity; (2) a legal person; or (3) an organisational unit without legal personality to which the law grants legal capacity – who uses or intends to use the Online Portal.
- 2.4. **SERVICE PROVIDER** – Bethink Sp. z o.o. with its registered office in Poznań (registered office and address for service: ul. Ułańska 3, 60-748 Poznań); entered in the Register of Entrepreneurs of the National Court Register under KRS no. 0000668811; the registration court where the company’s documentation is kept: the District Court Poznań – Nowe Miasto i Wilda in Poznań, 8th Commercial Division of the National Court Register; Tax Identification Number (NIP): 7811943756; REGON: 36680235.

## 3. Lawfulness of processing

- 3.1. The Processing of Personal Data by the Controller **shall be lawful only if and to the extent that** at least one of the following applies: (1) the Data Subject has given Consent to the Processing of his or her Personal Data for one or more specific purposes; (2) Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract; (3) Processing is necessary for compliance with a legal obligation to which the Controller is subject; or (4) Processing is necessary for the purposes of the Legitimate Interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of Personal Data, in particular where the Data Subject is a child.
- 3.2. Each instance of Processing of Personal Data by the Controller requires the existence of **at least one legal basis** set out in section 2.1 of this Privacy Policy. The specific legal bases for the Processing of the Online Portal Users' Personal Data by the Controller are indicated in the next section of this Privacy Policy—in relation to the relevant purpose of Processing of Personal Data by the Controller.

## 4. Purposes, legal basis and retention period of processing in the Online Portal

- 4.1. In each case, the purpose, legal basis, retention period and recipients of the Personal Data processed by the Controller result from the actions taken by a given User or Customer in the Online Portal or by the Controller. For example, if a Customer decides to make purchases in the Online Portal and chooses delivery by courier, his or her Personal Data shall be Processed for the purpose of performing the concluded Sales Agreement and shall be disclosed to the entity providing courier services on the Controller's behalf.
- 4.2. The Controller may Process Personal Data in the Online Portal for the following purposes, on the following legal bases, for the following periods and within the following scope:

Purpose of processing	Categories of Personal Data	Legal basis for Processing and retention period
<b>Mutual communication</b>		
Ensuring and handling contact with individuals who submit requests to the Controller.	Identification data (first name, last name), contact data (e-mail address, telephone number).	<p><b>Legal basis for Processing:</b> Article 6(1)(f) GDPR (Legitimate Interests of the Controller) – Processing is necessary for the purposes of the Legitimate Interests pursued by the Controller, consisting in responding to questions asked and conducting mutual correspondence.</p> <p><b>Retention period:</b> Personal Data shall be</p>

		Processed for as long as the Legitimate Interests pursued by the Controller exist, in particular until the matter forming the subject of the contact/inquiry has been resolved.
Establishment, exercise or defence of claims that may be asserted by the Controller or that may be asserted against the Controller by an Online Portal User.	Identification data (first name, last name, examination results data), financial data (bank account number), contact data (e-mail address, telephone number, residential address), data relating to the subject matter and performance of the service.	<p><b>Legal basis for Processing:</b> Article 6(1)(f) GDPR – Processing is necessary for the purposes of the Legitimate Interests pursued by the Controller, consisting in the establishment, exercise or defence of claims that may be asserted by the Controller or that may be asserted against the Controller.</p> <p><b>Retention period:</b> Personal Data shall be stored for as long as the Legitimate Interests pursued by the Controller exist, however no longer than until the limitation period for claims expires in relation to the Controller or the Data Subject in connection with the Controller’s business activity (the standard limitation period for claims against the Controller is <b>6 years</b>), or until an objection is raised.</p>
<b>Marketing activities</b>		
The Newsletter Service (sending marketing information to the User)	Identification data (first name), contact data (e-mail address, telephone number).	<p><b>Legal basis for Processing:</b> Article 6(1)(a) GDPR – the Data Subject’s Consent to receive marketing information by electronic means.</p> <p><b>Retention period:</b> Until Consent to receive marketing information by electronic means is withdrawn.</p>

<p>Keeping statistics on the use of the Online Portal.</p>	<p>IP address, user identifier (user ID), cookies (cookie ID), domain address, geographic and location data, age, gender.</p>	<p><b>Legal basis for Processing:</b> Article 6(1)(f) GDPR (Legitimate Interests of the Controller) – Processing is necessary for the purposes of the Legitimate Interests pursued by the Controller, consisting in keeping statistics related to the use of the Online Portal and the Controller’s services, in order to increase sales of Products and services.</p> <p><b>Retention period:</b> Personal Data shall be stored for as long as the Legitimate Interests pursued by the Controller exist, including until an effective objection to the Processing of Personal Data is raised (however no longer than until the last day of the calendar year following the lapse of 3 years from the end of service provision).</p>
<p>Operating social media accounts.</p>	<p>Identification data (first name, last name, username) and other data made available to other Portal users in accordance with the privacy settings of the Data Subject’s user account.</p>	<p><b>Legal basis for Processing:</b> Article 6(1)(f) GDPR (Legitimate Interests of the Controller) – Processing is necessary for the purposes of the Legitimate Interests pursued by the Controller, consisting in operating an account on a given social networking platform on the terms and conditions set by that platform, informing about the Controller’s activities via such platform, promoting events and the brand, Products and services, building and maintaining a community around the Controller, and communicating via the functionalities available within the service.</p> <p><b>Retention period:</b> Personal Data shall be stored for as long as the Legitimate Interests pursued by the Controller exist, however no</p>

		<p>longer than until the limitation period for the Controller's claims against the Data Subject expires in connection with the Controller's business activity, or until an effective objection is raised. The limitation periods are determined by provisions of law, in particular the Civil Code.</p>
<b>Ensuring the proper functioning of and monitoring the security of the Online Portal.</b>		
<p>Ensuring the proper functioning of the Online Portal.</p>	<p>Identification data (first name, last name), contact data (e-mail address, telephone number), IP address, browser settings.</p>	<p><b>Legal basis for Processing:</b> Article 6(1)(f) GDPR (Legitimate Interests of the Controller) – Processing is necessary for the purposes of the Legitimate Interests pursued by the Controller, consisting in operating and maintaining the Online Portal.</p> <p><b>Retention period:</b> Personal Data shall be stored for as long as the Legitimate Interests pursued by the Controller exist, however no longer than until the limitation period for the Controller's claims against the Data Subject expires in connection with the Controller's business activity, or until an objection is raised. Limitation periods are determined by provisions of law, in particular the Civil Code (the standard limitation period).</p>
<p>Ensuring ICT security of the provided services, implemented solutions or resources made available. Preventing abuse, circumvention of law and fraud.</p>	<p>Technical data transmitted to the server by the device used, browser settings, information on activities and actions taken within the Online Portal.</p>	<p><b>Legal basis for Processing:</b> Article 6(1)(b) GDPR – Processing is necessary for the performance of a contract, in accordance with the requirements of the Act on the National Cybersecurity System, including ensuring the security of the Company and Users.</p> <p><b>Retention period:</b> Personal Data shall be stored for the period necessary for the</p>

		performance of the contract, and until the contract is terminated or otherwise expires.
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## 5. Recipients of data in the Online Portal

- 5.1. For the proper functioning of the Online Portal, including for the performance of contracts concluded, it is necessary for the Controller to use the services of external entities (such as, for example, a software provider). The Controller uses only the services of such **Processors** who provide sufficient guarantees of implementing appropriate technical and organisational measures so that the Processing meets the requirements of the GDPR and protects the rights of Data Subjects.
- 5.2. The disclosure of data by the Controller does not take place in every case and not to all recipients or categories of recipients indicated in the Privacy Policy — the Controller discloses data only where this is necessary to achieve a given purpose of Processing of Personal Data and only to the extent necessary to achieve it.
- 5.3. Personal Data may be transferred by the Controller to a **third country** (i.e. outside the European Economic Area (EEA)). The Controller ensures that in such a case this will take place with regard to a country ensuring an adequate level of protection consistent with the GDPR, and that the Data Subject has the possibility to obtain a copy of his or her data. The Controller transfers the collected Personal Data only where and to the extent necessary to achieve a given purpose of Processing in accordance with this Privacy Policy. Personal Data may be transferred outside the EEA, inter alia, to:
  - 5.3.1. **Google LLC**, with its registered office in Mountain View, United States (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA), in connection with the use of the e-mail system and tools within Google Workspace (formerly G Suite and Google Apps for Work), for statistical and administrative purposes, and in connection with the use of **Google reCAPTCHA** to ensure security;
  - 5.3.2. **Google Ireland Limited**, with its registered office in Dublin, Ireland (Gordon House, Barrow Street, Dublin 4, Ireland), in connection with the use of personal data Processing services offered by this entity, aimed at ensuring the provision of services by the Controller offered within the Online Portal;
  - 5.3.3. **The Rocket Science Group LLC**, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA — provider of the **Mailchimp** service enabling the Controller to send messages;
  - 5.3.4. **Atlassian Pty Ltd c/o Atlassian, Inc.**, 1098 Harrison Street, San Francisco, CA 94103, USA — provider of **Atlassian Jira Software**, which the Controller uses to plan and track the process of developing and deploying the Online Portal software;
  - 5.3.5. **Functional Software, Inc. dba Sentry**, 45 Fremont Street, 8th Floor, San Francisco, CA 94105, USA — provider of an application used by the Controller to monitor, diagnose, fix and optimise the Online Portal software;

- 5.3.6. **Mailgun Technologies, Inc.**, 112 E Pecan St #1135, San Antonio, TX 78205, USA — provider of software enabling the Controller to send messages, including transactional messages;
  - 5.3.7. **Zapier, Inc.**, 548 Market St, San Francisco, California 94104, USA — provider of an application enabling the automation of sent messages;
  - 5.3.8. **Poll the people inc.**, with its registered office in Delaware, USA (16192 Coastal Highway, Lewes, Delaware 19958) — provider of the “CustomGPT” service — chat service provider enabling communication with customers.
- 5.4. Personal Data of Online Portal Users may be disclosed to the following recipients or categories of recipients:
- 5.4.1. providers of services supplying the Controller with technical, IT and organisational solutions (in particular providers of computer software for operating the website, a newsletter service system, e-mail and hosting providers, and entities providing technical support to the Controller) — the Controller discloses the collected Personal Data to a selected provider acting on its behalf only where and to the extent necessary to achieve a given purpose of Processing consistent with this section of the Privacy Policy;
  - 5.4.2. providers of legal and advisory services providing the Controller with legal or advisory support — the Controller discloses the collected Personal Data to a selected provider acting on its behalf only where and to the extent necessary to achieve a given purpose of Processing consistent with this section of the Privacy Policy;
  - 5.4.3. providers of chat services — providing customer communication services based on artificial intelligence (AI) solutions, including:
    - 5.4.3.1. Chatbase co. — providing the “Chatbot” service enabling customer service within the Online Portal by answering potential customers’ questions, inter alia, regarding services, offers and sales;
    - 5.4.3.2. Poll the people inc., with its registered office in Delaware, USA (16192 Coastal Highway, Lewes, Delaware 19958) — providing the “CustomGPT” service — within courses made available by the Controller inside the e-learning platform, consisting in acting as a subject-matter assistant answering course participants’ questions on the basis of information contained in the courses;
  - 5.4.4. providers of social plug-ins, scripts and other similar tools embedded in the Online Portal website that enable the browser of a person visiting the Online Portal website to download content from the providers of such plug-ins (e.g. logging in using social network login details) and, for this purpose, to transmit the visitor’s Personal Data to those providers, including:
  - 5.4.5. Facebook Ireland Ltd. — the Controller uses Facebook social plug-ins on the Online Portal website (e.g. Like, Share, Messenger, or login using Facebook login details) and therefore collects and discloses the Personal Data of a User of the Online Portal website to Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) to the extent and in accordance with the privacy rules available via Facebook (such data includes information about activities on the Online Portal website — including information about the device, websites visited, purchases, displayed advertisements and the manner of using services — regardless of whether the User has a Facebook account and whether

the User is logged into Facebook). Detailed information and rules regarding the Processing of data can be found there.

- 5.4.6. providers of marketing services, in particular Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA), Google Ireland Ltd. (Gordon House, Barrow Street, Dublin 4, D04E5W5, Ireland), TikTok Technology Limited (10 Earlsfort Terrace, Dublin, D02 T380, Ireland) and Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) and Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland) — the Controller collects information made available by Users and transfers it to the above entities for the purpose of remarketing activities, i.e. to deliver personalised advertisements to those Users and to target and create audiences similar to those Users in order to direct marketing communications to them. Detailed information and rules regarding the Processing of data by the above entities can be found respectively:
- 5.4.6.1. for data transferred to Google LLC and Google Ireland Ltd. — here: <https://policies.google.com/privacy?hl=en>
  - 5.4.6.2. for data transferred to Facebook Ireland Ltd. — here: <https://www.facebook.com/privacy/policy/>
  - 5.4.6.3. for data transferred to TikTok Technology Limited — here: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>
  - 5.4.6.4. for data transferred to Microsoft Ireland Operations Limited — here: <https://privacy.microsoft.com/en-gb/privacystatement>

## 6. Profiling in the Online Portal

- 6.1. The GDPR imposes on the Controller an obligation to provide information about automated decision-making, including profiling, as referred to in Article 22(1) and (4) GDPR, and—at least in those cases—meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject. With this in mind, the Controller provides in this section of the Privacy Policy information concerning possible profiling.
- 6.2. The Controller may use profiling in the Online Portal for the purposes of direct marketing; however, decisions taken by the Controller on the basis of such profiling do not concern the conclusion or refusal to conclude a Sales Agreement, nor do they concern the possibility of using Electronic Services in the Online Portal. The result of profiling in the Online Portal may be, for example, granting a given person a discount, sending a discount code, reminding them about unfinished purchases, sending a Product proposal that may correspond to that person's interests or preferences, or offering better terms compared to the standard offer of the Online Portal. Despite profiling, the individual freely decides whether to use the discount or better terms received in this way and make a purchase in the Online Portal.
- 6.3. Profiling in the Online Portal consists in the automated analysis or prediction of a person's behaviour on the Online Portal website, e.g. by adding a specific Product to the cart, viewing the page of a specific Product in the Online Portal, or by analysing the prior purchase history in the Online Portal. A condition for such profiling is that the Controller

has that person's Personal Data in order to subsequently send, for example, a discount code.

- 6.4. The Data Subject has the right not to be subject to a decision which is based solely on automated Processing, including profiling, and which produces legal effects concerning him or her or similarly significantly affects him or her.

## **7. Rights of the Data Subject**

- 7.1. Right of access, rectification, restriction, erasure or data portability — the Data Subject has the right to request from the Controller access to his or her Personal Data, rectification, erasure (“right to be forgotten”) or restriction of Processing, and has the right to object to Processing, as well as the right to data portability. Detailed conditions for exercising the above rights are set out in Articles 15–21 GDPR.
- 7.2. Right to withdraw Consent at any time — where the Data Subject's Personal Data are Processed by the Controller on the basis of Consent (pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR), the Data Subject has the right to withdraw Consent at any time, without affecting the lawfulness of Processing based on Consent before its withdrawal.
- 7.3. Right to lodge a complaint with a supervisory authority — the Data Subject whose Personal Data are Processed by the Controller has the right to lodge a complaint with a supervisory authority in the manner and procedure set out in the GDPR and Polish law, in particular the Act on Personal Data Protection. The supervisory authority in Poland is the President of the Personal Data Protection Office (PUODO).
- 7.4. Right to object — the Data Subject has the right to object at any time, on grounds relating to his or her particular situation, to the Processing of Personal Data concerning him or her which is based on Article 6(1)(f) GDPR (Legitimate Interests of the Controller), including profiling based on those provisions. In such a case, the Controller shall no longer Process such Personal Data unless the Controller demonstrates compelling legitimate grounds for the Processing which override the interests, rights and freedoms of the Data Subject, or grounds for the establishment, exercise or defence of legal claims.
- 7.5. Right to object to direct marketing — where Personal Data are Processed for direct marketing purposes, the Data Subject has the right to object at any time to the Processing of Personal Data concerning him or her for such marketing, including profiling, to the extent that the Processing is related to such direct marketing.
- 7.6. In order to exercise the rights referred to in this section of the Privacy Policy, the Data Subject may contact the Controller by sending an appropriate request in writing or by e-mail to the Controller's address indicated at the beginning of this Privacy Policy.

## **8. Cookies in the Online Portal, operational data and analytics**

- 8.1. Cookies are small text files that may be used by websites to make users' experience more efficient. The law states that we may store cookies on a User's device if they are strictly necessary for the operation of this website.
- 8.2. The Controller uses cookies to personalise content and advertisements, to provide social media features and to analyse traffic on its website. We share information about how you use our website with social media, advertising and analytics partners. These partners

may combine such information with other data provided by you or obtained by them in the course of your use of their services.

- 8.3. Cookies that may be sent by the Online Portal website can be divided into different types according to the following criteria:

<p><b>Due to their provider:</b></p> <ul style="list-style-type: none"> <li>• <b>first-party</b> (set by the Controller's Online Portal website); and</li> <li>• <b>third-party</b> (set by entities other than the Controller).</li> </ul>	<p><b>Due to their retention period on the device of a person visiting the Online Portal website:</b></p> <ul style="list-style-type: none"> <li>• <b>session cookies</b> (stored until logging out of the Online Portal or closing the web browser); and</li> <li>• <b>persistent cookies</b> (stored for a specific period defined by the parameters of each cookie or until manually deleted).</li> </ul>	<p><b>Due to the purpose of their use:</b></p> <ul style="list-style-type: none"> <li>• <b>Strictly necessary</b> — cookies required for the proper operation of the website; without them the website may not display correctly. These are IT data saved and stored by the browser. Strictly necessary cookies contribute to the usability of the website by enabling basic functions such as page navigation, use of customer support tools and access to content.</li> <li>• <b>Preferences/functional</b> — preference cookies allow the website to remember information that changes the way the website looks or behaves, e.g. the preferred language or the region in which the User is located.</li> <li>• <b>Statistics/analytics</b> — help website owners understand how different Users behave on the website by collecting and reporting anonymous information.</li> <li>• <b>Marketing/advertising and social media</b> — cookies that collect information about a person visiting the Online Portal website in order to display personalized advertisements to that person and to carry out other marketing activities, including on websites other than the Online Portal website, such as social networking platforms. They are used to track Users</li> </ul>
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		<p>across websites. The purpose is to display advertisements that are relevant and engaging for individual Users and thereby more valuable for publishers and third-party advertisers.</p> <ul style="list-style-type: none"> <li>• <b>Unclassified cookies</b> — cookies that are in the process of being classified, together with the providers of the individual cookies.</li> </ul>
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- 8.4. The Controller may Process data contained in cookies when visitors use the Online Portal website for the following specific purposes:

<p><b>Purposes of using cookies in the Controller's Online Portal</b></p>	<p>Remembering data from completed forms, surveys or login details for the Online Portal (strictly necessary and/or preference cookies).</p>
	<p>Adapting the content of the Online Portal website to the User's individual preferences (e.g. colours, font size, page layout) and optimising the use of the Online Portal website (preference cookies).</p>
	<p>Keeping anonymous statistics on how the Online Portal website is used (statistics cookies).</p>
	<p>Remarketing, i.e. examining the behavioural characteristics of visitors to the Online Portal through anonymous analysis of their activities (e.g. repeat visits to specific pages, keywords, etc.), in order to create a profile and deliver advertisements tailored to their presumed interests, also when they visit other websites within the advertising networks of Google Ireland Ltd. and Facebook Ireland Ltd. (marketing cookies).</p>

- 8.5. In the most popular web browsers, it is possible to check which cookies (including their lifespan and provider) are currently being sent by the Online Portal website as follows:

<p><b>In the Chrome browser:</b> (1) click the padlock icon on the left side of the address bar, (2) go to the "Cookies" tab.</p>	<p><b>W przeglądarce Firefox:</b> (1) w pasku adresu kliknij w ikonkę tarczy po lewej stronie, (2) przejdź do zakładki „Dopuszczone” lub „Zablokowane”, (3) kliknij pole „Ciasteczka śledzące między witrynami”, „Elementy</p>	<p><b>W przeglądarce Microsoft Edge:</b> (1) kliknij menu „Narzędzia”, (2) przejdź do zakładki „Opcje internetowe”, (3) przejdź do zakładki „Ogólne”, (4) przejdź do zakładki „Ustawienia”, (5) kliknij pole „Wyświetl pliki”</p>
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	śledzące serwisów społecznościowych” lub „Treści z elementami śledzącymi”	
<b>In the Opera browser:</b> (1) click the padlock icon on the left side of the address bar, (2) go to the “Cookies” tab.	<b>w przeglądarce Safari:</b> (1) kliknij menu „Preferencje”, (2) przejdź do zakładki „Prywatność”, (3) kliknij w pole „Zarządzaj danymi witryn”	<b>Niezależnie od przeglądarki, za pomocą narzędzi dostępnych np. na stronie:</b> <a href="https://www.cookie-matrix.com/">https://www.cookie-matrix.com/</a> lub: <a href="https://www.cookie-checker.com/">https://www.cookie-checker.com/</a>

- 8.6. By default, most web browsers available on the market accept the storage of cookies. Each person may determine the conditions for using cookies through the settings of his or her web browser. This means that it is possible, for example, to partially restrict (e.g. temporarily) or completely disable the storage of cookies — in the latter case, however, this may affect certain functionalities of the Online Portal (for example, it may be impossible to complete the Order path via the Order Form due to Products not being remembered in the cart during subsequent steps of placing the Order).
- 8.7. Browser settings regarding cookies are important from the perspective of Consent to the use of cookies by our Online Portal — under applicable regulations, such Consent may also be expressed through web browser settings. Detailed information on changing cookie settings and deleting cookies independently in the most popular web browsers is available in the browser’s help section and on the following websites (simply click the relevant link):
- 8.7.1. [Chrome](#)
  - 8.7.2. [Firefox](#)
  - 8.7.3. [Internet Explorer](#)
  - 8.7.4. [Opera](#)
  - 8.7.5. [Safari](#)
  - 8.7.6. [Microsoft Edge](#)
- 8.8. The Controller may use, within the Online Portal, **Google Analytics, Google Tag Manager, Google Signals** and **Google Ads** services provided by **Google Ireland Limited** (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Controller compile statistics and analyse traffic in the Online Portal. Data collected are Processed within the above services to generate statistics helpful in administering the Online Portal and analysing traffic in the Online Portal. These data are aggregated in nature. When using the above services in the Online Portal, the Controller collects data such as: sources and medium of acquisition of visitors to the Online Portal and their behaviour on the Online Portal website, information about the devices and browsers used to visit the website, IP address and domain, geographic data, as well as demographic data (age, gender) and interests. **Google Ads** and **Google Tag Manager** enable the Controller to carry out marketing and remarketing activities, consisting in running marketing campaigns and tailoring the content presented to Users, including personalisation of advertisements.

- 8.9. The use of **Google Analytics 4** (a tool for analysing the Online Portal's statistics) in combination with other Google products such as **Google Signals**, **Google Ads** and **Google Tag Manager** may result in:
- 8.9.1. linking an identifier stored in a cookie (**Cookie ID**) with the identifier of a User who has created an account in the Online Portal (**user ID**) in order to create profiled audience lists or perform more in-depth user analysis;
  - 8.9.2. collecting website and application data to enable a better understanding of the customer journey;
  - 8.9.3. measurement without the use of cookies, as well as modelling behaviours and conversions;
  - 8.9.4. analysing data on websites in order to optimise marketing activities and areas of the website;
  - 8.9.5. using predictive functions that suggest recommended actions without the use of complex models.
- 8.10. For analytical purposes, the Controller may also use the **Clarity** tool by analysing data on websites in order to optimise marketing activities and areas of the website.
- 8.11. For marketing and remarketing purposes, the Controller may also use **TikTok Ads** — these activities consist in running marketing campaigns and tailoring the content presented to Users,
- 8.12. It is possible for an individual to easily block the sharing of information about his or her activity on the Online Portal website with Google Analytics — for this purpose, one may, for example, install a browser add-on provided by Google Ireland Ltd. available here: <https://tools.google.com/dlpage/gaoptout?hl=pl>
- 8.13. The Controller may use, within the Online Portal, the **Facebook Pixel** service provided by **Facebook Ireland Limited** (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland). This service helps the Controller measure the effectiveness of advertisements and learn what actions visitors to the Online Portal take, as well as display tailored advertisements to those persons. Detailed information on how the Facebook Pixel works can be found at: [https://www.facebook.com/business/help/742478679120153?helpref=page\\_content](https://www.facebook.com/business/help/742478679120153?helpref=page_content)
- 8.14. By means of pixels embedded on the website, the Controller collects and then uses data in the form of audience lists. The Controller reaches Users who have previously interacted with its website or Products by displaying geo-targeted advertisements to them on other websites or advertising platforms, in order to maintain interest and encourage re-conversion.
- 8.15. Management of the Facebook Pixel is possible via the ad settings in a User's account on Facebook.com: [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)

## 9. Final Provisions

- 9.1. The Online Portal may contain links to other websites. The Controller encourages you to review the privacy policy applicable there after you navigate to other websites. This Privacy Policy applies only to the Controller's Online Portal.
- 9.2. This Privacy Policy is effective as of **19 January 2026**.

## Appendix No. 1 to the Cookies Policy

### Cookies used by the Controller:

Name	Domain	Provider	Purpose	Expiry	Type
<b>Strictly necessary cookies</b>					
CookieScriptConsent	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	cookie-script.com	Stores the User's consent.	1 year	HTTP Cookie
webp_lossless_supported	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	Strictly necessary cookies for the operation of the Online Portal.	Persistent	HTML Local Storage
webp_lossy_supported	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	Strictly necessary cookies for the operation of the Online Portal.	Persistent	HTML Local Storage
test_cookie	<a href="http://doubleclick.net">doubleclick.net</a>	doubleclick.net	Strictly necessary cookies for the operation of the Online Portal.	1 day	HTTP Cookie
CONSENT	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Strictly necessary for the operation of video content.	2 years	HTTP Cookie
<b>Preference cookies</b>					
CookieScriptConsent	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	cookie-script.com	Stores the User's consent.	1 year	HTML Local Storage
<b>Statistics cookies</b>					
rc::a	<a href="http://gstatic.com">gstatic.com</a>	www.google.com	Collects data about the User's session.	Persistent	HTML Local Storage
rc::c	<a href="http://gstatic.com">gstatic.com</a>	www.google.com	Collects data about the User's session.	Session	HTML Local Storage
_ga	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	www.google-analytics.com	Collects data about the User's session.	25 months	HTTP Cookie
_ga_#	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	www.googletagmanager.com	Collects data about the User's session.	25 months	HTTP Cookie
_gat	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	www.google-analytics.com	Collects data about the User's session.	1 day	HTTP Cookie
_gid	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	www.google-analytics.com	Collects data about the User's session.	1 day	HTTP Cookie
muxData	<a href="http://embed.ted.com">embed.ted.com</a>	pa.tedcdn.com	Collects data about the User's session.	20 years	HTTP Cookie
collect	<a href="http://google-analytics.com">google-analytics.com</a>	www.google-analytics.com	Collects data about the User's session.	Session	Pixel Tracker
visitor-id	<a href="http://media.net">media.net</a>	embed.ted.com	Collects data about the User's session.	1 year	HTTP Cookie
_ga	<a href="http://ted.com">ted.com</a>	www.google-ana	Collects data about the User's	2 years	HTTP Cookie

		lytics.com	session.		
_gid	<a href="http://ted.com">ted.com</a>	www.google-ana lytics.com	Collects data about the User's session.	1 day	HTTP Cookie
vuid	<a href="http://vimeo.com">vimeo.com</a>	f.vimeocdn.com	Collects data about the User's session.	2 yeras	HTTP Cookie
td	<a href="http://www.googletagmanager.com">www.googletag manager.co m</a>	www.googletag manager.com	Collects data about the User's session.	Session	Pixel Tracker
IDE	<a href="http://doubleclick.net">doubleclick.ne t</a>	doubleclick.net	Collects data about the User's session.	1 year	HTTP Cookie
<b>Marketing cookies</b>					
JSESSIONID	<a href="http://nr-data.net">nr-data.net</a>	player.vimeo.co m	Stores the User's consent.	Session	HTTP Cookie
__cf_bm	<a href="http://vimeo.com">vimeo.com</a>	player.vimeo.co m	Strictly necessary for the operation of video content.	1 day	HTTP Cookie
_fbp	<a href="http://wiecejnizlek.pl">wiecejnizlek.pl</a>	connect.faceboo k.net	Collects data about the User's session for the purposes of marketing activities within Facebook.	3 months	HTTP Cookie
playerconfig	<a href="http://pa.tedcdn.com">pa.tedcdn.com</a>	embed.ted.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	HTML Local Storage
UID	<a href="http://scorecardrese&lt;br/&gt;arch.com">scorecardrese arch.com</a>	embed.ted.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie
ads/ga-audiences	<a href="http://www.google.c&lt;br/&gt;om">www.google.c om</a>	www.google.co m	Collects data about the User's session for the purposes of marketing activities within Google Ads.	Session	Pixel Tracker
pagead/1p-user-li st/#/	<a href="http://www.google.c&lt;br/&gt;om">www.google.c om</a>	www.google.co m	Collects data about the User's session for the purposes of marketing activities within Google Ads.	Session	Pixel Tracker
ads/ga-audiences	<a href="http://www.google.ie">www.google.ie</a>	www.google.ie	Collects data about the User's session for the purposes of marketing activities within Google Ads.	Session	Pixel Tracker

pagead/1p-user-list/#/	<a href="http://www.google.ie">www.google.ie</a>	www.google.ie	Collects data about the User's session for the purposes of marketing activities within Google Ads.	Session	Pixel Tracker
LAST_RESULT_ENTRY_KEY	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie
LogsDatabaseV2:V#  LogsRequestsStore	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	IndexedDB
nextId	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie
remote_sid	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie
requests	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie
ServiceWorkerLogsDatabase#SWHealthLog	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	IndexedDB
TESTCOOKIESEENABLED	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	1 day	HTTP Cookie
VISITOR_INFO1_LIVE	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	180 dni	HTTP Cookie
YSC	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie
yt.innertube::nextId	<a href="http://youtube.com">youtube.com</a>	www.youtube.com	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	HTML Local Storage

ytidb::LAST_RES ULT_ENTRY_KE Y	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	HTML Local Storage
YtldbMeta#datab ases	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	IndexedDB
yt-remote-cast-av ailable	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTML Local Storage
yt-remote-cast-ins talled	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTML Local Storage
yt-remote-connect ed-devices	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	HTML Local Storage
yt-remote-device-i d	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Persistent	HTML Local Storage
yt-remote-fast-ch eck-period	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTML Local Storage
yt-remote-session -app	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTML Local Storage
yt-remote-session -name	<a href="https://www.youtube.com">youtube.com</a>	www.youtube.co m	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTML Local Storage
mnet_session_de pth	<a href="https://embed.ted.com">embed.ted.co m</a>	hbx.media.net	Collects data about the User's session for the purposes of marketing activities related to video content.	Session	HTTP Cookie