

PRIVACY AND COOKIES POLICY

We respect your privacy and care about the security of personal data entrusted to us. In this Privacy Policy we explain what data we process, for what purposes, on what legal bases, and what rights are available to data subjects.

The Policy applies to the website operated at www.eratrust.pl and to contact and cooperation with ERA-TRUST. If the Service contains links to websites of other entities, the owners of those websites are responsible for the rules of data processing on those websites.

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DEFINITIONS

Personal data – any information relating to an identified or identifiable natural person, including the device IP address, location data, online identifier and information collected through cookies or similar technologies.

Policy – this Privacy Policy.

PKE – the Polish Act of 12 July 2024, Electronic Communications Law.

GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Service – the website operated by the Controller at www.eratrust.pl. The Service may be used by persons aged at least 16. Its purpose is to provide content, products and services for business.

User – a natural person using the Service or any of its individual functionalities.



WHO IS THE CONTROLLER OF MY PERSONAL DATA?

The Controller, i.e. the entity deciding how your personal data will be used, is Piotr Powązka (hereinafter: “ERATRUST”), NIP 894-247-19-04, correspondence address: Urząd Pocztowy Skierniewice 2, 96-100 Skierniewice, P.O. Box no. 4.

If you have any questions related to the processing of your personal data by ERATRUST, you may contact us at: biuro@eratrust.pl or by traditional mail to the address indicated above.



WHERE DOES ERATRUST GET MY DATA FROM?

You have provided or will provide your personal data voluntarily. Data may also come from other sources, such as LinkedIn business portals and other social media platforms enabling business relationships to be established, or from publicly available sources. In such cases ERATRUST processes data to the extent adequate for the purpose of contact, cooperation or management of a business relationship and, where required by law, informs you about the source of the data.

Providing data is **voluntary, but necessary to send a response to your inquiry about using the services offered** (including training, audits, support in implementing GDPR, building contractual solutions, process modelling) or to handle a complaint.

Providing data is also **voluntary and necessary to conclude and perform an agreement after choosing a service and to make settlements required by law.**

Providing data is also **voluntary and necessary to become our employee, co-worker or partner.**

For marketing purposes and for receiving commercial information, providing data is voluntary and confirmed by giving the relevant consent to receive such communication from ERATRUST in the form of regular notifications, e.g. by e-mail or telephone.

The scope of contact data provided to us includes: first name, surname, telephone number, e-mail address and NIP and REGON numbers (including IP address or other identifiers and information collected through cookies or other similar technologies). The necessary data in the contact form are first name, surname and e-mail address.

The scope of contact data in the case of recruitment and employee data results from labour law and other provisions, if applicable, and may require your additional consent.



WHAT IS THE PURPOSE OF PROCESSING, THE LEGAL BASIS, AND HOW LONG DOES ERATRUST PROCESS MY PERSONAL DATA?

ERATRUST needs your personal data for the following purposes:

	Purposes of processing	Legal basis for processing	Storage period
	Actions aimed at concluding, or concluding and performing, an agreement with a client , which also constitutes provision of electronic services in the scope of content made available to Users in the Service. Concluding, performing and monitoring the performance of an agreement with our client , in particular for communication, information obligations, cooperation and other contractual obligations arising from the agreement and performed by employees and co-workers of our contractor.	Art. 6(1)(b) and (f) GDPR Art. 6(1)(f) GDPR	Duration of the agreement and, after its termination, until expiry of limitation periods for claims arising from it, generally 3 years, up to 6 years.
	Identification of the sender and handling of the inquiry sent through the form or e-mail address, in the scope of data necessary ¹ or excessive ² to establish contact or handle the inquiry.	1 Art. 6(1)(b) GDPR 2 Art. 6(1)(a) GDPR	For 1 year counted from the end of the year in which the warranty period or complaint settlement period expired.
	For analytical and statistical purposes (we do not conduct analyses or statistics concerning website users).	Art. 6(1)(f) GDPR	Until we cease using the data in connection with other indicated purposes.
	Handling complaints and grievances (direct contact with the client in the case of sole proprietorships, or with employees/co-workers of clients).	Art. 6(1)(b) and (f) GDPR	For 1 year counted from the end of the year in which the warranty period or complaint settlement period expired.
	Pursuing claims or defending against legal claims (employees/co-workers of potential contractors, contractors or Users).	Art. 6(1)(f) GDPR	The period depends on the duration of proceedings concerning the claims pursued, i.e. until their final conclusion. In

			enforcement proceedings, until the final satisfaction of the claims pursued.
	Archiving documentation and fulfilling legal obligations (e.g. agreements, settlement documents).	Art. 6(1)(c) and (f) GDPR	The period depends on the law; if no period is specified, we will store the data within the Controller's legitimate interest for the period necessary for possible pursuit of claims.
	Carrying out marketing activities by traditional means, i.e. without using electronic means of communication. We need to promote our products and services.	Art. 6(1)(f) GDPR	Until an objection to such processing is raised and for the limitation period for claims.
	Carrying out marketing activities using electronic means of communication. We need to promote our products and services also through electronic channels.	Art. 6(1)(f) GDPR, PKE: consent to the marketing communication channel for ordered content, e.g. a newsletter.	Until an objection to such processing is raised. Until consent to the communication channel is withdrawn and for the limitation period for claims.
	Processing data from ERATRUST fanpage profiles on social media platforms, consisting in promotion of our own brand, communication/chats with you, comments and platform statistics.	Art. 6(1)(f) GDPR within joint controllership, e.g. with Facebook and LinkedIn.	Until an objection to such processing is raised.
	If you participate in training , on the basis of your consent we may process and disseminate your image as part of our marketing activities by placing a film or photographs from the training, e.g. on the Organiser's channel on YouTube, Vimeo or social media platforms, in promotional materials and on ERATRUST websites. In some cases such processing may result from an agreement concluded with ERATRUST and you. In such a case the purpose of performance of the agreement indicated earlier in this table applies.	Art. 6(1)(a) GDPR, Art. 81(1) and (2) of the Polish Copyright and Related Rights Act. Art. 6(1)(b) GDPR	Until consent is withdrawn. Duration of the agreement and, after its termination, until expiry of limitation periods for claims arising from it, generally 3 years, up to 6 years.

	Webinars (online events). If you participate in our webinar, we process participants' personal data, among other things, to identify participants, contact them and handle the event, in the scope of data necessary for actions aimed at concluding an agreement¹ or excessive² to establish contact or handle an inquiry. Data will also be processed for analytical and statistical purposes³, such as satisfaction surveys related to participation in the event, handling complaints and grievances⁴, pursuing claims or defending against claims⁵, and marketing activities in traditional form and through electronic communication⁶. Events may be recorded and made available, e.g. on the organiser's channel on YouTube, Vimeo or social media platforms, in promotional materials and on ERA-TRUST websites, within our legitimate interest in promoting the brand.⁷	¹ Art. 6(1)(b) GDPR ² Art. 6(1)(a) GDPR ³ Art. 6(1)(f) GDPR and, where your consent is required, e.g. for cookies when online-event technology is used and is not necessary for the service to function. ⁴ Art. 6(1)(b) and (f) GDPR ⁵ Art. 6(1)(f) GDPR ⁶ Art. 6(1)(f) GDPR and PKE ⁷ Art. 6(1)(f) GDPR	^{1,2} Duration of the agreement and, after its termination, until expiry of limitation periods for claims arising from it, generally 3 years, up to 6 years. ³ Until we cease using data in connection with other indicated purposes. ⁴ For 1 year from the end of the year in which the warranty period or complaint settlement period expired. ⁵ Until proceedings concerning claims are finally concluded; in enforcement proceedings, until claims are finally satisfied. ^{6,7} Until an objection to such processing is raised. Until consent to the communication channel is withdrawn and for the limitation period for claims.
	Technical operation of the Service, security, server logs and necessary cookies.	Art. 6(1)(f) GDPR (ensuring security of the Service, detecting abuse, protection against attacks, diagnostics and correction of errors, pursuing or defending against claims) and the relevant provisions of PKE concerning storing information or accessing information on the user's terminal equipment.	For the period necessary to ensure security and administer the Service, and then in accordance with the periods resulting from the purpose of securing claims.

If for any reason the limitation period for claims is shorter than the period required for storing documentation for tax and accounting settlement purposes, the storage period for such documentation is 5 years after the end of the year in which the financial event occurred, until tax liabilities become time-barred (maximum 6 years). Unless indicated otherwise, for simplicity, ERA-TRUST counts periods expressed in years from the end of the year in which personal data processing began. This simplifies and improves the process of deleting or destroying personal data.

For accountability purposes, data may, in principle, be stored indefinitely.



DO I HAVE TO PROVIDE ERATRUST WITH MY PERSONAL DATA AND WHAT ARE THE CONSEQUENCES OF NOT PROVIDING IT?

Providing data is voluntary. Depending on the purpose, however, failure to provide data may make it impossible to:

- answer a question or handle the contact form;
- prepare an offer, conclude or properly perform an agreement;
- handle a complaint or conduct correspondence in the matter;
- participate in training, a webinar or another event;
- receive the newsletter or other ordered commercial information;
- issue settlement documents if the data is required by law.



WHAT RIGHTS DO I HAVE TOWARDS ERATRUST REGARDING THE DATA PROCESSED?

In relation to the processing of your personal data by ERATRUST, you may request from ERATRUST:

- **access** to the data;
- **rectification** of data where the data is inaccurate or incomplete;
- **erasure** of data where the data is no longer necessary for the purposes for which it was collected by ERATRUST; where you have previously objected to the processing of the data; where the data is processed unlawfully; or where the data must be erased to comply with a legal obligation;
- **restriction** of processing where the data is inaccurate, for a period enabling ERATRUST to verify its accuracy; where the data is processed unlawfully but you do not want it erased; where ERATRUST no longer needs the data but you need it for the establishment, exercise or defence of claims; or where you object to processing, until it is determined whether legitimate grounds override the grounds of objection;
- **withdrawal of consents** granted, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal;
- **data portability** where processing is based on an agreement concluded with you and is carried out by automated means;
- **objection** where personal data is processed on the basis of legitimate interest and/or for statistical purposes, direct marketing, including profiling, and the objection is justified by your particular situation.

If you wish to exercise your rights, please contact us: e-mail: biuro@eratrust.pl or in writing to: Piotr Powązka, Urząd Pocztowy Skierniewice 2, 96-100 Skierniewice, P.O. Box no. 4.

You also have the right to lodge a complaint in relation to the processing of your personal data by ERATRUST with the President of the Personal Data Protection Office (address: Biuro Prezesa Urzędu Ochrony Danych Osobowych, ul. Stawki 2, 00-193 Warsaw).

In the case of social media platforms and your profiles on them, we inform you that in many cases these platforms enable you to manage your profile and exercise your rights. Therefore ERATRUST cannot interfere with, for example, rectification of your personal data contained on those platforms; the requester must contact the platforms directly. Except for data provided to us through social media by using Like, Follow, sharing options, chats, messages or comments via our fanpages, we can exercise only some rights. We also cannot delete your data from the platforms, although we may delete a comment or messages sent to us if this does not violate the law or ERATRUST's legitimate interest, or where ERATRUST has another legal basis and must process the data. To our knowledge, restriction of processing on the platforms by ERATRUST is not possible, nor is data portability, as we do not have your social media data in a portable form.

Rules and data collection by social media platforms and search engines. More information about rights and privacy rules is available directly on the websites of social media platforms, for example Facebook, Google and LinkedIn.

Facebook: <https://www.facebook.com/about/privacy>

https://www.facebook.com/legal/FB_Work_Privacy

Google: <https://policies.google.com/privacy?hl=pl-pl>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>



WHO ARE THE RECIPIENTS OF MY DATA?

Your personal data may be accessed by companies or persons such as:

- advocates and attorneys-at-law in the scope of services they provide to ERATRUST clients;
- trainers conducting training for you;
- banks and payment service providers;
- entities handling shipments;
- persons or companies supporting our business operations, such as providers of ICT systems, Microsoft Corp. office solutions, Content Delivery Network services protecting our Service, accounting office and accounting system providers, providers of security and website functionality, including e-mail automation, tax advisers and insurers in the scope of handling insurance policies;
- social media services such as Facebook or LinkedIn if, for example, you like the ERATRUST profile, comment on a post or an event organised by ERATRUST on those social media platforms;
- other persons or companies supporting us in the performance of agreements concluded with you based on appropriate arrangements;
- where the Service contains links to third-party websites, this privacy statement does not apply to those websites, and the use of such links may take you to another website with its own privacy policy, which you should read;
- Facebook Ireland Ltd and LinkedIn Ireland Unlimited Company in connection with the use of ERATRUST profiles on those services.

If it becomes necessary to process your data for audit purposes, it may be disclosed to an external auditor engaged by ERATRUST.

In exceptional cases your data may also be disclosed to competent state authorities, in particular where ERATRUST pursues or defends claims.

Where required by law, if necessary, we enter into appropriate agreements with the indicated entities, defining suitable guarantees for the protection of your personal data.



ERATRUST jointly controls, to a certain extent, your data with Facebook Ireland Limited and LinkedIn Ireland Unlimited Company. Use of these platforms is subject to the rules set out by their operators. This applies in particular to holding an account, posting comments, sending messages, following a profile, reacting to content and analysing statistics made available to page administrators.

- a) ERATRUST and Facebook, as well as ERATRUST and LinkedIn, are joint controllers of your data in accordance with Article 26 of the GDPR with regard to the processing of data for statistical and advertising purposes on the Facebook and LinkedIn platforms.
- b) Joint control involves the aggregate analysis of data for the purpose of displaying statistics on user activity on the ERATRUST fan page on both platforms.
- c) The scope of responsibility of Facebook Ireland and LinkedIn Ireland Unlimited Company for the processing of your data for the specified purposes:
 - having a legal basis for data processing for the purposes of page statistics;

- ensuring that the rights of data subjects, i.e. your rights, are upheld when using Facebook or LinkedIn. In the case of the Facebook or LinkedIn social media platforms, where you have a profile, please note that it is Facebook Ireland and LinkedIn Ireland Unlimited Company, respectively, that enable you to manage your profile and exercise most of your rights.

Consequently, ERATRUST is unable to intervene or, for example, rectify your personal data held on these platforms (the data subject must contact Facebook or LinkedIn directly in such cases).

With the exception of when you provide us with your data from a social media platform by using, for example, 'Like', 'Follow' or similar options to share posts or information, or via chats, messages or comments on our fan pages, ERATRUST can only fulfil certain rights. We are also unable to delete your data from the platform (we may, for example, delete a comment or messages sent to us – provided this does not infringe the law or a legitimate interest of ERATRUST, or we have another legal basis and are required to process such data). To the best of our knowledge, it is not possible for ERATRUST to exercise the right to restrict data processing on Facebook or LinkedIn, nor the right to data portability (we do not hold your data on our fan page in a format that allows it to be transferred from the social media platform);

- reporting data breaches to the supervisory authority and notifying data subjects affected by the breach of the incident;
 - ensuring appropriate technical and organisational measures to safeguard the security of your data.
- d) The scope of ERATRUST's responsibility for the processing of your data in connection with our fan page:

- having a legal basis for processing data for statistical purposes;
 - fulfilling information obligations regarding the purposes of processing carried out by ERATRUST.
- e) Facebook Ireland and LinkedIn Ireland Unlimited Company will make the essential content of the annex concerning page statistics available to data subjects (Article 26(2) of the GDPR), via the information contained in the Page Statistics Information, which can be accessed from all pages.

f) The lead supervisory authority for joint data processing is the Irish Data Protection Commission www.dataprotection.ie (notwithstanding the provisions of Article 55(2) of the GDPR, where applicable). Detailed information regarding the arrangements between the joint controllers, i.e. ERATRUST and Facebook Ireland Ltd. and ERATRUST and LinkedIn Ireland, is available on the following pages respectively: https://www.facebook.com/legal/terms/page_controller_addendum
Information on the processing of your personal data by Facebook Ireland is available at: <https://www.facebook.com/privacy/explanation>
<https://legal.linkedin.com/pages-joint-controller-addendum> (in English only).

The policy on the processing of your personal data by LinkedIn Ireland Unlimited Company is available at: <https://www.linkedin.com/legal/privacy-policy>



DO YOU TRANSFER MY DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

As a rule, we do not transfer personal data outside the European Economic Area ("EEA"). Taking into account the services provided by our subcontractors in relation to ICT support and IT infrastructure, ERATRUST may commission certain IT activities or tasks to approved subcontractors operating outside the EEA, which may result in data transfer outside the EEA. Under a European Commission decision, countries of recipients outside the EEA may ensure an adequate level of personal data protection consistent with EEA standards.

Where recipients are located outside the EEA and are not covered by a European Commission adequacy decision, ERATRUST enters into agreements with recipients of personal data based on standard contractual clauses issued by the European Commission to ensure an appropriate level of protection. The Commission's decision for the USA covers companies participating in the Data Privacy Framework programme: <https://www.dataprivacyframework.gov/s/>.

A copy of the standard contractual clauses and information on appropriate safeguards may be obtained from ERATRUST as the Controller. We apply safeguards to your data in accordance with the principles set out in Chapter V GDPR.



IS MY DATA PROFILED?

ERATRUST does not use automated decision-making that produces legal effects concerning users or profiling that could similarly significantly affect their situation.

ERATRUST does not use Google Analytics, Google Ads, Facebook Pixel, LinkedIn Insight Tag, Hotjar or similar tools to track users' activity in the Service, conduct marketing analytics, remarketing or create behavioural profiles of website users.



IS MY DATA SAFE WITH YOU?

When processing personal data, we attach great importance to its security, as if it were data concerning ourselves. We apply appropriate organisational and technical measures compliant with law and market practice, such as data encryption, connection encryption using an SSL certificate and access rights management, to protect data against loss, damage, unauthorised access, modification or disclosure. Personal data collected by ERATRUST is directly accessible only by authorised ERATRUST employees or co-workers and by authorised persons or entities applying appropriate security measures.



USE OF COOKIES AND SIMILAR TECHNOLOGIES ON THE WEBSITE

- The Service uses only cookies necessary for its proper operation, security and handling of basic functionalities. Necessary cookies do not require the user's consent because they serve to provide a service expressly requested by the user or are technically necessary.
- ERATRUST does not use cookies or similar technologies to track user activity, profiling, behavioural marketing, web analytics, remarketing or measuring advertising effectiveness.
- Currently, the Service may use in particular:

Name	Purpose	Type
PHPSESSID	maintaining the session and proper website operation	session / technical cookie
wp-wpml_current_language	remembering the selected Service language	technical cookie / language functionality

- In particular, the Service currently does not use Google Analytics, Google Ads, Facebook Pixel, LinkedIn Insight Tag or Hotjar. If in the future ERATRUST starts using analytical or advertising tools requiring consent, the Policy will be updated accordingly and the user will be given the possibility to manage consents in accordance with PKE.

The user may manage cookies through the settings of their web browser. Limiting the handling of some cookies may affect the proper operation of the Service, in particular technical or language functions.

- Server logs

Use of the Service involves sending requests to the server. Logs may include in particular the IP address, date and time of the request, information about the browser, operating system, URL address and technical errors. Logs are used solely for technical, administrative and security purposes. They are not used by ERATRUST to identify users for marketing purposes or to track their activity in the Service.

Additional information: You may opt out of interest-based advertising displayed by social media services or companies cooperating with them through the Digital Advertising Alliance in the USA, the Digital Advertising Alliance of Canada in Canada, or the European Interactive Digital Advertising Alliance in Europe.

Please remember that so-called opt-out settings also save cookies. If the browser cache is cleared, it may be necessary to repeat your settings.



CHANGES TO THE PRIVACY POLICY

This Privacy Policy may be updated by ERATRUST by publishing a new version in the Service. Updated on 20/07/2026.