**PRIVACY POLICY**

valid from May 23, 2018.

Accent School of Polish Katarzyna Roś, ul. Kącik 6, 30 -549 Kraków, NIP 944 157 51 48, the owner of the website www.polishforforeigners.com, makes every effort to protect the privacy of people using it. In order to implement the principle of lawful, reliable and transparent processing of your personal data while using our services, we adopt a document called Privacy Policy.

Privacy Policy determines how we take care of your personal data and your rights.

**1. GLOSSARY OF TERMS USED IN THE POLICY:**

 **Accent School of Polish, AsoP, we, our** - Accent School of Polish Katarzyna Roś with headquarters in Krakow, ul. Kącik 6.

**Our clients** - Accent School of Polish clients to whom ASoP provides educational services (Polish as a foreign language courses).

**RODO** - Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of persons in relation to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC (General Data Protection Regulation).

**Customer** - an adult natural person who has a current contract with Accent School of Polish.

**Potential Customer** - an adult natural person who is interested in the offer of Accent School of Polish.

**Potential Employee** - an adult natural person who is interested in cooperating with Accent School of Polish.

 **You, yours** - respectively the Customer or the Potential Customer.

**Website, our website** - [www.polishforforeigners.com](http://www.polishforforeigners.com)

**2. WHO IS THE ADMINISTRATOR OF YOUR PERSONAL DATA AND HOW CAN YOU CONTACT US?**

Accent School of Polish Katarzyna Roś is the administrator of your personal data you provided to us by filling out the forms on the website.

If you have any questions regarding the processing of your personal data and your rights, please contact us by sending an email to accent@polishforforeigners.com.

**3. WHICH PERSONAL DATA DO WE PROVIDE, FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS?**

In order to provide you with the most transparent information, we have grouped this information with regard to the purpose of processing your personal data.

**INQUIRY ABOUT THE OFFER**

**The scope of data:** For this purpose, we process personal data provided by you in the application form, that is, e-mail address, first and last name, telephone number and data which you voluntarily give us in the inquiry.

**Legal basis:** Preparation and performance of the contract (Article 6 (1) (b) of the GDPR).

**SIGNING THE CONTRACT**

**Types of contracts:** a contract for the provision of educational services individually or in groups. **The scope of data:** For this purpose, we process personal data provided by you in the application form, that is, e-mail address, name and surname, telephone number and data which you voluntarily provide to us in the content of your inquiry.

**Legal basis:** Preparation and performance of the contract (Article 6 (1) (b) of the GDPR).

**RECRUITMENT REGISTRATION**

For this purpose, we process personal data provided by you in the application form or sent to us by e-mail, that is your e-mail address, first and last name, telephone number, country of origin and date of birth.

**Legal basis:** Your consent to data processing.

**STATISTICS OF USING THE SITE**

**The scope of data:** For these purposes, we process personal information about your activity on our website, such as: visited pages and subpages and the amount of time spent on each of them.

**Legal basis:** Our legally legitimate interest (Article 6 (1) (f) of the RODO), consisting in facilitating the use of our website and improving our services.

**PROCESSING COMPLAINTS AND CONCLUSIONS, RESPONDING TO QUERIES**

**The scope of data:** For this purpose, we may process certain personal data provided by you in the form, as well as data on the use of our services that result in a complaint or request, data contained in documents attached to a complaint or application.

**Legal basis:** Our legally legitimate interest (Article 6 (1) (f) of the RODO), consisting in improving the functionality of services and building positive relationships with clients and potential clients based on reliability and loyalty.

**SATISFACTION SURVEYS**

**The scope of data:** For this purpose, we process your personal data including: email address and information about the date of the sent message, as well as your answers to the questions we have prepared, included in the surveys and forms used for the satisfaction survey.

**Legal basis:** Our legally legitimate interest (Article 6 (1) (f) of the RODO), consisting in improving the relevance and quality of services and assessing the satisfaction of customers and potential customers.

**MARKETING OUR SERVICES**

**The scope of data:** For this purpose, we process personal data provided by you when filling out the form on the website and data about your activity on the Website, recorded and stored via cookies (question whether you have cookies). Activity data relates in particular to such data as: search history, clicks on the website, visits to the home page and subpages, history and your activity related to our e-mail communication with you.

**Profiling:** The above data is used to create your profile, corresponding to your interests, expectations and preferences. Subsequently, we adjust marketing information about our products and services that may interest you to the profile created this way.

**Legal basis:** Our legally legitimate interest (Article 6 (1) (f) of the RODO), consisting in the marketing of our products and services.

**Balance of interests:** Having considered our interest and your interests, rights and freedoms, we believe that marketing combined with profiling will not interfere excessively with your privacy and will not be too burdensome for you.

We respect your free will and facilitate implementation of your rights. For this purpose, we provide the ability to easily withdraw consent to receive marketing messages. You can express your lack of consent by writing to us at accent@polishforforeigners.com. At the same time, we treat withdrawal of consent to receive such messages as protesting against profiling for marketing purposes.

**6. WHO HAS ACCESS TO YOUR PERSONAL DATA?**

We transfer your personal data to the following categories of recipients:

**Accent School of Polish employees**

We share your data with our employees and colleagues so that they can contact you for the purposes you have agreed to.

**Service providers**

We pass on your personal data to the service providers we use. The service providers to whom we pass your personal data, depending on contractual arrangements and circumstances, are either bound by our directions as to the purposes and methods of processing this data (processors) or independently determine the purposes and ways of processing them (administrators).

**Processors**

 We use suppliers who process your personal data only on our instructions. They provide us with a cloud computing service, with systems for online marketing, displaying web push notifications, sending e-mails, analyzing website traffic, and analyzing the effectiveness of marketing campaigns.

**State authorities**

We provide your personal data if we are approached by authorized state authorities, in particular, organizational units of the prosecutor's office, the Police, the General Inspector of Personal Data Protection (in the future, the Head of the Office for Personal Data Protection), the Head of the Office of Competition and Consumer Protection or the Head of the Office of Electronic Communications, as well as Border Patrol and Internal Security Agency.

**7. HOW LONG DO WE STORE YOUR PERSONAL DATA?**

The period of storage of your data depends on the purpose:

1. recruitment - your data will be with us for 90 days or if you agreed to participate in further recruitment - for a period of 36 months from application date.

2. offer - for a period of 12 months

3. contract - from the date of application to 24 months from the date of completion of the contract

4. marketing of our services and products - for a period of 24 months

5. for other purposes listed in point 3 of this policy - for a period of 12 months.

**8. WHAT ARE YOUR RIGHTS IN CONNECTION TO PERSONAL DATA PROCESSING?**

We ensure the implementation of your rights listed below. You can exercise your rights by submitting a request to accent@polishforforeigners.com.

**The right to withdraw consent**

 You have the right to withdraw any consent you gave when you submitted the form, as well as the data that you provided to us by sending an e-mail. Withdrawal of consent takes effect from the moment of withdrawal of consent. The withdrawal of consent does not affect the processing carried out by us in accordance with the law before its withdrawal. Withdrawal of consent does not entail any negative consequences for you. It may, however, prevent further use of services that we can legally provide only with consent (e.g. opportunities to participate in further recruitment or receive commercial information).

Legal basis: art. 7 par. 3 RODO

**The right to object to the use of data**

You have the right to object at any time to the use of your personal data, including profiling, if we process your data based on our legitimate interest, marketing our services, maintaining statistics of use or satisfaction testing. If your objection turns out to be well founded and we have no other legal basis to process your personal data, we will delete your information the use of which you objected against.

Legal basis: art. 21 RODO

**The right to delete data** ("the right to be forgotten")

You have the right to request the removal of all or some personal data. You have the right to request the deletion of personal data if:

a) You have withdrawn a certain consent to the extent to which your personal data has been processed based on your consent;

b) Your personal data has ceased to be necessary for the purposes for which they were collected or processed;

c) You objected to the use of your data for marketing purposes;

d) You objected to the use of your data for the purpose of statistics of website use and satisfaction surveys, and the opposition was considered justified;

e) Your personal data is processed unlawfully.

Despite the request to delete personal data, in connection with opposition or withdrawal of consent, we may retain certain personal data to the extent necessary to establish, assert or defend claims. This applies in particular to personal data including: name, surname, e-mail address and history of the application, which we retain for the purpose of handling complaints and claims.

Legal basis: art. 17 RODO

**The right to restrict data processing**

 You have the right to request a restriction on the processing of your personal data. You can do this, e.g., in the following cases:

a) when you question the accuracy of your personal data - then we restrict its use to the time needed to verify the accuracy of your data, but no longer than for 7 days;

b) if the processing of your data is against the law, and instead of removing the data, you demand restriction of its use;

c) where your personal information has ceased to be necessary for the purposes for which we have collected or used it, but it is necessary for you to determine, assert or defend claims;
d) if you object to the use of your data - then the restriction occurs for the time needed to consider whether, in your particular situation, protection of your interests, rights and freedoms outweighs the interests which we fulfill when processing your personal data.

Legal basis: art. 18 RODO

**The right to access your data**

 You have the right to obtain confirmation from us whether we process your personal data, and if this is the case, you have the right to:

a) obtain access to your personal data;

b) obtain information about the purposes of processing, categories of personal data being processed, the recipients or categories of recipients of this data, the planned period of storage of your data or criteria for determining this period, about your rights under RODO (GDPR) and the right to lodge a complaint to the supervisory authority, the source of this data, on automated decision-making, including profiling and safeguards applied in connection with the transfer of this data outside the European Union;

c) obtain a copy of your personal data.

Legal basis: art. 15 RODO

**The right to rectify data**

You have the right to rectify and supplement your personal data. With regard to other personal data, you have the right to request us to correct this data (if it is incorrect) and to supplement it (if it is incomplete).

Legal basis: art. 16 RODO

 **The right to transfer data**

You have the right to receive your personal data that you provided to us and then send it to another personal administrator of your choice, for example to another operator of similar services. You also have the right to request that personal data be sent by us directly to such other administrator, if it is technically possible. We will send your personal data in the form of a pdf file.

Legal basis: art. 20 RODO

**When do we fulfill your request?**

If, when exercising the aforementioned rights, you make a request to us, we comply with this request or refuse to comply with it without delay, but no later than within 14 days of its receipt. However, if - due to the complex nature of the request or the number of requests - we will not be able to meet your request within 14 days, we will meet it within the next month, having informed you in advance about the intended extension.

**Reporting complaints, queries and requests**

You can submit complaints, inquiries and requests regarding the processing of your personal data and the exercise of your rights. If you believe that your right to the protection of personal data or other rights granted to you by virtue of RODO have been violated, you have the right to lodge a complaint with the Inspector General for Personal Data Protection (future Head of the Office for Personal Data Protection).
  **9. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?**

We strive to ensure the security of your personal data. We use modern cloud solutions, anti-virus programs, Firewall, we secure our telecommunications end devices with a password.
**10. HOW DO WE USE COOKIES?**

Details on how we use cookies can be found in our **Cookies Policy**

**11. CHANGES IN THE PRIVACY POLICY**

Depending on your needs, we can change and supplement the Privacy Policy. We will inform you about any changes or additions by posting relevant information on our website [www.polishforforeigners.com](http://www.polishforforeigners.com) and in the case of very important changes, we will send the information to you by e-mail.