

**PRIVACY POLICY OF ALSENDO LIMITED LIABILITY COMPANY (SPÓŁKA Z  
OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ) WITHIN THE WEBSITE**

**[www.inposteasy.com](http://www.inposteasy.com)**

**Table of contents**

1. Definitions we use.....	1
2. What is the purpose and scope of the Privacy Policy? .....	2
3. Details of the Controller and Data Protection Officer.....	2
4. Purposes and legal basis for the processing of personal data.....	2
5. From whom do we obtain personal data?.....	3
6. Who can we share personal data with? .....	4
7. How long do we store personal data?.....	5
8. What rights does the data subject have?.....	6
9. Automated decision-making, including profiling .....	7
10. Voluntary provision of data .....	7
11. Cookies.....	9
12. Changes to the Privacy Policy .....	9

**This document contains the rules for the processing of personal data and the use of cookies related to the operation of the website.**

## **1. Definitions**

- **Consumer** – a natural person who orders Transport Services via the Platform:
  - (i) for private purposes, i.e. not directly related to their business or professional activity; or
  - (ii) in connection with a sole proprietorship, when the content of the contract indicates that it is not of a professional nature for that person;
- **Platform** - a website operated at [www.inposteasy.com](http://www.inposteasy.com) enabling the submission of Orders;
- **Carrier** - InPost or another entity affiliated with InPost by capital, personnel or a binding agreement, which is permanently and professionally involved in the transport or forwarding of goods in domestic or international transport and operates in a given Local Market; The list of Carriers assigned to individual Local Markets is attached as Appendix 1 to the Terms and Conditions;
- **Terms and Conditions** – Terms and Conditions for the Provision of Services via the Platform;
- **GDPR** – 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) (OJ EU L 2016 No. 119, p. 1, as amended);
- **Privacy Policy** – this document, describing the manner and purposes of the Company's processing of personal data in connection with the use of the Platform.
- **Website** – the website operated by the Company at [www.inposteasy.com](http://www.inposteasy.com), enabling Users to use the Services;
- **Company** – Alsendo limited liability company (spółka z ograniczoną odpowiedzialnością) with its registered office in Warsaw, at ul. Puławska 2, 02-566 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw, 12th Commercial Division, KRS: 0000678992, REGON: 367328934, NIP: 8971840043, hereinafter also referred to as "Alsendo".
- **Services** – services provided by Alsendo to Customers on the basis of the Terms and Conditions, consisting in enabling Customers to place Orders via the Platform, without the need to register, and settling the remuneration for the Ordered Transport Services;
- **Transport Services** - services provided by the Carrier selected by the Customer, consisting in the acceptance, sorting, transport and delivery of a shipment, under the terms and conditions specified in the relevant Carrier's Terms and Conditions;
- **User** - A consumer or other entity that has accessed the Platform website;
- **Order** - an order for Transport Services placed by the Customer via the Platform.

With regard to the terms used in this Privacy Policy and not defined in this document, the Controller refers to the content of the Terms and Conditions.

## **2. What is the purpose and scope of the Privacy Policy?**

This Privacy Policy describes how Alsendo processes the personal data of Users and their recipients, including the scope and legal basis for such processing, as well as the rights of these persons in relation to the processing of their personal data.

By accepting the Terms and Conditions, the User is also informed that the processing of personal data by the Company will be carried out in accordance with the rules set out in the Privacy Policy.

### 3. Data Controller and Data Protection Officer details

The Company is the data controller of the personal data provided by the User in connection with the use of the Platform. This provision does not apply to data collected using cookies, the data controller of which is InPost sp. z o.o., with its registered office in Krakow. Detailed information about InPost and the rules for processing data collected through cookies can be found in the Cookie Policy, in section 11.

In order to contact the data controller and obtain information on the processing of personal data, you may contact the data controller by sending an e-mail to: [iod@alsendo.com](mailto:iod@alsendo.com)

The data controller has appointed a Data Protection Officer, who may be contacted by sending an e-mail to: [iod@alsendo.com](mailto:iod@alsendo.com)

### 4. Purposes and legal basis for the processing of personal data

The legal basis for the processing of personal data by the Company varies depending on the purpose for which the processing is carried out.

Purpose of personal data processing	Legal basis for processing
Use of the Platform, including the provision of Services offered through the Platform, including the operation of the electronic form available on the Platform and the handling of Orders for the transport of Shipments	Article 6(1)(b) of the GDPR, i.e. processing is necessary for the performance of a contract to which the data subject is party
Settlement of Services provided via the Platform, including the issuance of a document confirming payment of remuneration for the Shipment and settlement of remuneration for the Transport Service with the Carrier, as well as the storage of settlement documents and the performance of other related obligations arising from legal provisions, in particular tax law provisions	Article 6(1)(c) of the GDPR, i.e. processing is necessary for compliance with a legal obligation to which the controller is subject
Correspondence in matters related to the functioning of the Platform or the Services provided	Article 6(1)(f) of the GDPR, i.e. processing necessary for the purposes of the legitimate interests pursued by the Company
Verification of the User's fulfilment of the conditions entitling them to use the Services under the terms and conditions set out in the Terms and Conditions	Article 6(1)(b) of the GDPR, i.e. processing is necessary to take action at the request of the data subject prior to entering into a contract, and Article 6(1)(f) of the GDPR, i.e. processing necessary for the purposes of the legitimate interests pursued by the Company

Handling the complaint process, including establishing, pursuing or defending against claims related to the use of the Services	Article 6(1)(f) of the GDPR, i.e. processing necessary for the purposes of the legitimate interests pursued by the Company
Carrying out analytical processes to improve the quality of services	Article 6(1)(f) of the GDPR, i.e. processing necessary for the purposes of the legitimate interests pursued by the Company
Sharing Users' personal data with other controllers, including Carriers and data recipients, in order to ensure the proper functioning of the Platform and the performance of Services	Article 6(1)(b) of the GDPR, i.e. processing is necessary for the performance of a contract to which the data subject is party
Creating statistics relating to various information sent by the Company electronically (e-mail) in order to determine their status (message delivered, undelivered, read, unread, SPAM, etc.), with the proviso that the Company may not always be able to use such tools.	Article 6(1)(f) of the GDPR, i.e. processing necessary for the purposes of the legitimate interests pursued by the Company
Data processing to the extent strictly necessary and proportionate to ensure network and information security (i.e. ensuring the resilience of the network or information system at a given level of confidentiality, for example, against incidents or unlawful or hostile actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data). Data processing for the purpose referred to in the previous sentence may take place in the context of various types of tests of the proper functioning of information systems (including IT systems).	Article 6(1)(f) of the GDPR, i.e. processing necessary for the purposes of the legitimate interests pursued by the Company.

## 5. From whom do we obtain personal data?

We obtain personal data directly from the data subject.

## 6. Who can we share personal data with?

The Company may transfer personal data processed in connection with the operation of the Platform to such entities (data recipients) as:

Carriers	To the extent and for the purpose necessary for these entities to provide transport services to the User, as well as to obtain the position of these entities regarding complaints submitted by the User regarding transport services provided by these entities <a href="#">InPost Privacy Policy</a>
Online payment service providers	To the extent and for the purpose necessary to process online payments for the Services

<ul style="list-style-type: none"> <li>• Entities processing personal data on behalf of the Company on the basis of an agreement concluded with the Company or another legal instrument, e.g.: <ul style="list-style-type: none"> <li>- IT service providers,</li> <li>- analytical service providers,</li> <li>- providers of accounting, auditing, consulting and other services.</li> </ul> </li> </ul>	<p>To the extent and for the purpose specified in a given agreement or other legal instrument for the purposes of supporting the Company in fulfilling its legal and contractual obligations, as well as for the purposes of improving the efficiency, profitability and functionality of the Platform or the Services offered through it</p>
<p>Entities related to the Company by capital or personnel</p>	<p>To the extent and for the purposes arising from a legitimate interest consisting in the transfer of customer data to related entities for internal administrative, reporting and training purposes</p>
<p>Entities providing legal services</p>	<p>To the extent and for the purpose necessary for the Company to fulfil its legal and contractual obligations, as well as to establish, pursue or defend against claims</p>
<p>Public administration bodies, including tax authorities; broadly understood judicial authorities (including law enforcement authorities, courts, etc.)</p>	<p>To the extent and for the purposes required by generally applicable law</p>

As the Services provided by the Company also include the organisation of international shipments, the Company may transfer personal data to entities based in third countries, e.g. in connection with commissioning them to perform transport services.

In the event of personal data being transferred to third countries, the Company guarantees that it will only do so in a situation where an adequate level of protection of the personal data transferred is ensured by transferring the data to entities based in those countries which the European Commission has recognised as providing an adequate level of personal data protection, or by applying, in business relations with suppliers of specific services, so-called standard contractual clauses, recognised by the European Commission as contractual provisions ensuring the same protection of personal data as that afforded to them in the European Union.

### 7. How long do we store personal data?

The length of time for which the Company will store specific personal data depends on the purpose for which it was obtained.

Sometimes the same set of personal data is processed for several purposes, therefore, the completion of personal data processing for one of these purposes does not necessarily mean that the data will be deleted immediately, as it may still be processed for other purposes.

Scope and purpose of the data obtained	Storage period
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Data entered into the Platform in order to use the Platform's functionality	Until the expiry of the limitation period for civil law claims that may arise in connection with the Services provided by the Company
Settlement data collected in connection with the settlement of the Services provided	Until the expiry of the limitation period for public law obligations specified in generally applicable law
Data contained in correspondence with the Company in connection with the functioning of the Platform, which the Company did not previously have at its disposal	Until the date of termination of correspondence in a given case, and after that date, until the expiry of the limitation period for civil law claims that may arise in connection with the case that is the subject of the correspondence
Data collected in connection with complaints other than data previously held by the Company	Until the end of the complaint procedure, and after that date, until the expiry of the limitation period for civil law claims that may arise in connection with the matter that is the subject of the complaint, unless they prove necessary for the Company to achieve its tax purposes
Identification and contact details of a potential User	Until an objection is lodged. However, if the potential User becomes a User, the personal data will be stored for the same period as the User's personal data
Identification data and e-mail address processed for statistical purposes	Until an objection is raised, and if the data subject is a User, personal data will be stored for the same period as the User's personal data, except that it will not be used for the purpose specified in the adjacent column.

## 8. What rights does the data subject have?

The data subject, after meeting the conditions specified in the GDPR, has the right to:

**1) Requesting access to personal data from the Company** – the data subject has the right to obtain confirmation from the Company as to whether personal data concerning him or her are being processed and, if so, has the right to access them and obtain information concerning, inter alia, the purpose of processing, the categories of data processed, the recipients of the data and the storage period.

**2) Requesting rectification of data** - the data subject has the right to request the Company to immediately rectify any personal data concerning them that is incorrect. Taking into account the purposes of the processing, the data subject has the right to request the completion of incomplete personal data, including by providing an additional statement.

**3) Right to erasure or restriction of processing** - the right to erasure of personal data may be exercised if, among other things, the personal data collected is no longer necessary for the purposes for which it was collected or otherwise processed, or if the data was processed unlawfully. In certain situations, the Company may refuse to delete data, e.g. when processing it is necessary for the Company to comply with a legal obligation. The right to restrict data processing may be exercised if, among other things,

the data subject questions the accuracy of the personal data or if the processing is unlawful and the data subject opposes the erasure of the personal data, requesting instead that its use be restricted;

**4) Objection to processing** - the data subject has the right, inter alia, to object at any time, on grounds relating to their particular situation, to the processing of their personal data based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions. The company may no longer process such personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

**5) Data portability** - the data subject has the right to receive, in a structured, commonly used and machine-readable format, the personal data concerning him or her which he or she has provided to the Company, and has the right to transmit those personal data to another controller without hindrance from the Company to which the personal data have been provided, where the conditions set out in Article 20 of the GDPR are met.

**6) Lodging a complaint with the supervisory authority** – the President of the Personal Data Protection Office – If the data subject considers that the processing of their personal data is unlawful, they have the right to lodge a complaint with the President of the Personal Data Protection Office.

The detailed scope of the rights of the data subject is set out in the provisions of the GDPR.

For more information on your rights regarding the processing of personal data, and to exercise those rights, please contact the Data Protection Officer using the details provided in section 3 of the Privacy Policy.

## **9. Automated decision-making, including profiling**

The Company does not use the collected personal data for automated decision-making, including profiling.

## **10. Voluntary provision of data**

Providing personal data to the Company is voluntary, but if you do not provide it for one or more of the specified purposes, it may not be possible to use the Platform or the Services offered through it.

## **11. Cookie Policy**

11.1. Cookies are small text files stored on your device (e.g. computer, phone, tablet) when you use our Website. Cookies perform various functions, including recognising the device you are using, remembering your selected settings so that the Website is displayed in your preferred manner, and enabling the collection of anonymous data on how the Website is used, which allows the data controller to improve its structure and content.

11.2. The data controller of personal data processed in connection with the use of cookies on the Website is InPost spółka z o.o. with its registered office in Krakow, at ul. Pana Tadeusza 4, 30-727 Krakow (hereinafter: "Inpost" or "we"). You can contact us or the DPO we have appointed by writing to the above address or sending an email to: dane\_osobowe@inpost.pl.

11.3. When you use the Website available at [www.inposteasy.com](http://www.inposteasy.com) (hereinafter: the "Website"), we may collect information about your activity using cookies or similar technologies, such as tracking

pixels, as well as data relating to the device you use. Detailed information about these tools and the rules governing their use can be found in the Cookie Policy available at [Cookie Policy | InPost](#).

11.4. We receive information from cookies from Alsendo sp. z o.o., with its registered office in Warsaw (hereinafter: "Alsendo"), which, as the Website administrator, is responsible for their initial collection. In this respect, Alsendo acts as a data processor and operates exclusively on our behalf, in accordance with the data processing agreement concluded between the parties.

11.5. Your data is processed for the purposes specified in this Cookie Policy, including ensuring the proper functioning of the Website, statistical analysis and, if you give your consent, for marketing and analytical purposes (you may manage your consents via the "Manage cookies" banner available on the Website). Consent is voluntary and may be withdrawn at any time, without affecting the lawfulness of processing carried out prior to its withdrawal.

11.6. We use the following types of cookies:

- Session cookies – temporary, deleted after logging out, leaving the website or closing the browser. They help analyse traffic, solve technical problems and facilitate navigation on the Website.
- Persistent cookies – stored for a period specified in their parameters or until you delete them. They remember your settings and preferences to make subsequent visits more convenient.

Cookies are divided into the following categories:

- Necessary cookies – required to use the Website and its basic functions. They do not require consent. Legal basis: legitimate interest of the controller, Article 6(1)(f) of the GDPR.
- Optional cookies – used only after consent has been given, including:
  - Analytical – collect information about how the Website is used, help detect errors and analyse traffic sources. Legal basis: consent, Article 6(1)(a) of the GDPR.
  - Marketing cookies – used to tailor advertisements to your interests, including through the services of external providers. Legal basis: consent, Article 6(1)(a) of the GDPR.

11.7. We process your personal data for marketing purposes. This may involve displaying content tailored to your interests (behavioural advertising) and targeting advertising on other websites and social media (remarketing). They may also include displaying marketing content that is not tailored to your preferences (contextual advertising) and sending commercial information through various channels to which you have given your prior consent. We may send you information about offers and content related to our products and services, Integer.pl Group companies and cooperating entities.

11.8. In the case of activities involving the display of personalised advertising content, we act on the basis of our legitimate interest in increasing the reach of marketing campaigns (Article 6(1)(f) of the GDPR), and to the extent required by law, we act on the basis of your consent.

11.9. We may use the data obtained to create a user profile, which means that through automatic processing we will be able to predict or assess various aspects of you, such as your age, gender, interests, economic situation or location. This allows us to tailor content and offers to your needs, making it easier for you to use our services. Profiling is carried out as part of our legitimate interest in conducting personalised marketing campaigns, and our trusted partners also participate in the process of displaying advertisements.

11.10. As part of our marketing activities, we (or our trusted partners) may re-display advertisements to users of our Website on other websites and social media.

11.11. Our company also operates on an affiliate model, which means we work with partners who promote our products or services in exchange for performance-based remuneration (e.g. clicks, registrations, sales). As part of this cooperation, we may process personal data, including data from cookies, to settle affiliate activities and conduct marketing campaigns. The legal basis for the processing is our legitimate interest (Article 6(1)(f) of the GDPR), consisting in promoting services and settling cooperation with partners.

11.11. We may combine the data we collect from you on the Website with information from public sources and third parties, such as analytics providers (e.g. Google Analytics), who provide us with technical data and information about how our services are used.

11.13. The processing time of your data depends on the purposes for which we use it and the legal basis for its processing. We process information from cookies until the expiry of individual cookies or until you withdraw your consent or delete the cookie from your device (if you do so before the cookie expires).

11.14. You have the following rights: to access your data and receive a copy of it, to rectify your data, to request the deletion of your data, to request the restriction of data processing, and the right to transfer your data. You also have the right to object to the processing of your data for marketing purposes, if the processing is carried out in connection with our legitimate interest, and also – for reasons related to your particular situation – in other cases where the legal basis for data processing is our legitimate interest (e.g. in connection with analytical and statistical purposes).

In order to exercise the above rights, please contact us by e-mail at [dane\\_osobowe@inpost.pl](mailto:dane_osobowe@inpost.pl) or using the contact details provided in point 2.

If you have doubts about the lawfulness of our processing of your personal data, you have the right to lodge a complaint with the supervisory authority, which in Poland is the President of the Personal Data Protection Office.

11.15. We only transfer personal data outside the EEA when necessary. We ensure protection at the level required by the GDPR. To this end, we cooperate with data processors in countries for which the European Commission has issued a decision confirming an adequate level of data protection; we use standard contractual clauses issued by the European Commission; we apply binding corporate rules approved by the competent supervisory authority.

## **12. Changes to the Privacy Policy**

If there are any changes related to the way the Company processes personal data or changes related to the functionality of the Platform that affect the way this processing is carried out, the content of the Privacy Policy may be changed.