



PRIVACY POLICY

This Policy constitutes the basic information on the purposes, methods of processing and security of your personal data as a user of the website: airtilion.com (hereinafter referred to as the “Website”). By reading this Privacy Policy you will learn who is the controller of your personal data, which personal data are collected by the Website, for what purposes they are used and how they are protected.

§1. Basic information

1. The controller of your personal data is: **Airtilion Sp. z o.o.** with its registered office in Tarnów, ul. Słoneczna 32/9, 33-100, TAX ID (NIP): 8733299720, REGON: 540390460.
2. You can contact the Data Controller via:
 - e-mail: **contact@airtilion.com**
 - contact form: **airtilion.com/#kontakt**
 - by telephone: **+48 511 019 652, +48 720 177 174**

§2. Principles of data processing

1. The Controller processes personal data in compliance with the following principles:
 1. based on a legal basis and in accordance with the law (legality);
 2. fairly and honestly (fairness);
 3. in a transparent manner for the data subject (transparency);
 4. for specific purposes and not “in reserve” (data minimization);
 5. not more than necessary (adequacy);
 6. with care for data accuracy (accuracy);
 7. not longer than necessary (storage limitation);
 8. ensuring appropriate data security (security).



§3. Purposes, legal bases and scope of processing

1. We will process your data for the following purposes:

- 1) **Contact purposes** — to reply to your message sent to us by e-mail, via the contact form, via social media channels or in response to a telephone contact, on the basis of the Controller's legitimate interest connected with the need to reply to you;
- 2) **Marketing purposes** — only on the basis of the consent you have given;
- 3) **Informational purposes** — to send you important information related to the services you use through our Website;
- 4) **Managing our corporate social media profiles** (in particular Facebook / Instagram etc.) — on the terms set by the owners of the given platform and to inform about our products, promotions and other business-related messages, which we consider to be our legitimate interest;
- 5) **Technical purposes using cookies (technical cookies)** — on the basis of the Controller's legitimate interest related to the proper functioning of the Website;
- 6) **Statistical and analytical purposes** — if you have consented to the use of cookies for analytical purposes (analytical cookies);
- 7) **Marketing purposes through cookies** — if you have consented to the use of cookies for marketing purposes (marketing cookies);
- 8) **Archiving phone numbers, messages, e-mails** — on the basis of the Controller's legitimate interest related to protection against claims;
- 9) **Analysis of anonymous information** — information collected via our Website such as browser, operating system, device, time spent on the site, page transitions, link clicks, approximate location, age bracket, gender. These data are anonymized, collected via advertising and analytics systems provided by our partners. They do not allow identification of a specific user. These data are used for marketing, analytical and statistical purposes.



2. We process your data in the following scope:

- 1) if you send us a message by e-mail, via the contact form, social media channel or provide information by telephone, we will process the data contained in that message. Provision of data in this way is voluntary. You may request deletion of those data at any time;
- 2) if you like a post, leave a comment, write, react or otherwise interact with our corporate social media profile (e.g. Facebook, Instagram), we will process the data you provided in that medium and to which we have access. To stop processing, you may unsubscribe from our profile;
- 3) other data we process include the IP address and other data stored in cookies. You decide to what extent we may use cookies with your data. Provision of these data is voluntary. You can change your preferences at any time—either in your browser or by deleting cookies saved by our Website;
- 4) use of APIs (application programming interfaces) provided by external partners in order to integrate various functionalities (such as maps, analytics, advertising or social media). Use of these APIs may lead to creation of additional cookies or use of existing cookies to process user data. External partners may store and process those data in accordance with their own privacy policies.

§4. No automated profiling on the Website

1. We do not use automated profiling on the Website for the purpose of creating marketing campaigns based on measuring user activity that would allow us to target selected advertising material to an individually identified user.
2. Although we use advertising systems of our partners (Facebook, Google), the information and data they collect about your activity on the Website, which we may use to create marketing campaigns, do not constitute automated profiling on our part because they do not enable us to make decisions regarding you as an individual user (e.g., to show you a specific ad). We may create ads only for user groups based on aggregated statistical data provided by partners. We are not able to make a specific user see a particular ad based solely on activity data.
3. More information about how our partners profile users and create audience groups can be found in their privacy policies listed in the paragraph below.



§5. Recipients of data and the intention to transfer data to countries outside the EEA or to international organisations

1. Depending on the purpose for which we process your data, the recipients of your personal data may include:
 - 1) public authorities and other public institutions, to the extent that the obligation to transfer data results from laws applicable in the territory of the Republic of Poland — e.g., for the purpose of fulfilling legal obligations of the Controller such as pursuing legal claims, fulfilling tax obligations and other proceedings regulated by appropriate laws;
 - 2) the Website's software provider (hosting, server, domain);
 - 3) the entity providing programming maintenance of the Website;
 - 4) the entity handling the Website's marketing and social media channels;
 - 5) provider of cloud storage/document management software;
 - 6) provider of cookie management and data processing management software;
 - 7) if you have consented to marketing cookies, your cookie-stored data will be transmitted to our advertising partners (Facebook, Google);
 - 8) if you have consented to analytical cookies, your cookie-stored data will be processed by the provider of traffic analysis software on our Website (e.g. Google Analytics).
2. Your data are not transferred to countries outside the European Economic Area (EEA) or to international organisations, except for cases where processing is performed by the following entities:
 - 1) **Google Inc. (USA)** — for website analytics in Google Analytics and for providing additional functionalities (such as Google Maps, Google Search Console) related to proper functioning of the Website and search results. See how Google processes and protects your data. This browser add-on will allow you to manage the scope and level of access to data collected by Google Analytics;
 - 2) **Google Inc. (USA)** — for advertising and measuring ad effectiveness in Google Ads. See how Google processes and protects your data;
 - 3) **Meta Platforms, Inc. (USA)** — for managing the account and access to data in social platforms (Facebook, Instagram), advertising and measuring their effectiveness connected with the installation of the Facebook Pixel on the Website and Conversion API. See how Facebook processes and protects your data;



- 4) **Google Inc. (USA)** — for virtual drive software used to store company documentation (customer and contractor handling documentation and GDPR documentation). See how Google protects your data;
- 5) **Google Inc. (USA)** — for hosting embedded videos from YouTube on the Website. Google collects data about your preferences and viewing activity, which may affect displayed ads and your playlists. See how YouTube protects privacy.

§6. Storage period

1. We cannot define a single period during which we will process your data.
2. If you have provided your data in a message sent by e-mail, telephone, via the contact form or via social media where we maintain corporate profiles, we will process your data until you request their deletion or object to the processing, but also in cases where we consider that we have achieved the Controller's legitimate interest.

§7. Data subject rights

1. In relation to the processing of your data you have the following rights:
 - 1) the right of access to your data and the right to rectification, deletion and restriction of processing;
 - 2) the right to data portability;
 - 3) the right to object;
 - 4) the right to withdraw consent to processing at any time and in any form, unless the processing is carried out for the performance of a contract by the Controller, for the Controller's compliance with legal obligations toward public authorities, or for the Controller's legitimate interests.
2. You also have the right to lodge a complaint with the President of the Personal Data Protection Office (Urząd Ochrony Danych Osobowych), at the address: ul. Stawki 2, 00-193 Warsaw.
3. More information about data protection can be found on the Personal Data Protection Office website: www.uodo.gov.pl



§8. Information about cookies

1. Our Website uses cookies.
2. When you visit the Website, you may decline consent to the use of cookies — a notice is displayed upon entering the site.
3. Cookies are small text files stored on users' devices while browsing the Website. They are used to facilitate use of our Website, improve service quality and enable analysis of traffic and user behaviour.
4. Cookies may be persistent or temporary (session). Persistent cookies are stored on the user's device for a defined period or until they are deleted by the user. Session cookies are removed after the browser is closed.
5. We use both first-party cookies and third-party cookies. First-party cookies are used to ensure correct operation of the Website, personalize content, save user preferences and analyse statistics. Third-party cookies are used by external analytics, advertising tools and for integration with social media.
6. Users have the right to control and limit how cookies are used on our site. Most web browsers allow management of cookies, including blocking, limiting or deleting cookies. Detailed information on managing cookies can be found in your browser settings.
7. Please note that disabling or limiting cookies may affect the functionality of the Website and the quality of services.
8. We use different kinds of cookies to better adapt to users' needs and to ensure optimal use of the Website.

§9. Why we use cookies

1. **User convenience:** Cookies can significantly affect the comfort of browsing the Website.
2. **Content personalization:** Cookies enable adjusting displayed content to user preferences and interests, making the site more useful.
3. **Remembering settings:** Cookies permit the Website to remember user settings such as language, layout or color scheme, enabling faster and more convenient use.
4. **Session maintenance:** Cookies help track user activity across pages, enabling returning to recently visited sections or continuing unfinished actions (e.g. filling forms).
5. **Performance optimization:** Cookies can be used for traffic analysis and behaviour analysis which helps optimize performance and deliver high-quality content.



6. **Advertising:** Cookies allow displaying personalized ads tailored to the user's interests and needs, making ads less intrusive and more relevant.
7. **Social media integration:** Cookies enable integration with social networks (Facebook, Twitter, Instagram), facilitating sharing, commenting or liking content and using additional features.

§10. Functions of technical cookies

1. **Remembering user preferences:** Technical cookies allow the site to store information about user preferences (selected language, font size, color settings, other personalization).
2. **Form handling:** Technical cookies support functioning of site forms (login, registration, contact), ensuring proper processing of data entered by users.
3. **Performance optimization:** Technical cookies enable monitoring of site performance and loading speeds for optimization.
4. **Security:** Technical cookies help provide site security (e.g., verifying user identity, detecting intrusion attempts, protecting against CSRF attacks).

§11. Functions of analytical cookies

1. **Traffic measurement:** Analytical cookies allow monitoring visits, unique users and page views to give an overall picture of site popularity and performance.
2. **Behaviour analysis:** They collect data on how users navigate the site (time on pages, navigation paths, exit points).
3. **Conversion optimization:** They help identify elements that affect conversion rates (e.g. signups, orders, contact form submissions).
4. **User segmentation:** Analytical cookies enable grouping users by various criteria for better content and offer tailoring.
5. **A/B testing:** Analytical cookies are used in A/B testing to compare two versions of the site and see which better meets goals.

§12. Functions of marketing cookies

1. **Personalised advertising:** Marketing cookies enable showing ads tailored to the user's interests and browsing history.



2. **Remarketing:** They allow tracking users who visited the Website but did not complete an action, and retargeting them with ads to encourage return and conversion.
3. **Advertising effectiveness measurement:** Marketing cookies help monitor campaign performance (clicks, conversions, impressions) for optimization.
4. **Cross-channel ad management:** They facilitate coordination of advertising across multiple channels (search, social, partner sites).
5. **Testing and optimisation of ad content:** Marketing cookies are used for testing (including A/B) and evaluating which creatives and messages work best.