

## PRIVACY AND COOKIES POLICY OF TRAINERS.ORG

---

1. **Trainers.org** – website available at [www.trainers.org](http://www.trainers.org), through which the Trainers Organization provides the Users with electronic services on the terms set out in the Terms and Conditions.
2. **Comments** - content entered into Trainers.org by the Users through the 'add comment' field.
3. **Account** - the User's individual access to Trainers.org, available after the User's Registration and entering the login and password in the designated place.
4. **Controller** – Mateusz Stasiak conducting business activity under the business name Trainers Organization Mateusz Stasiak with its registered office in Łódź, ul. Piramowicza 11/13, 90-254 Łódź, REGON: 385431285, NIP: 9820343301.
5. **Privacy and Cookies Policy** – this document specifying the rules for the processing of personal data and the use of cookies, available at [www.trainers.org/polityka-prywatnosci](http://www.trainers.org/polityka-prywatnosci).
6. **Terms and Conditions** – Terms and Conditions of the website Trainers.org, available at [www.trainers.org/regulamin](http://www.trainers.org/regulamin).
7. **Registration** - the activity consisting in completing the registration form available at Trainers.org, accepting the Terms and Conditions and giving consent to the processing of personal data, which allows the User to create an Account and to gain access to some of the content of Trainers.org, unavailable for the unregistered Users.
8. **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) (Official Journal of the European Union 2016 L 119/1)
9. **Services** – services provided to the Users by the Trainers Organization through Trainers.org in accordance with the Terms and Conditions.
10. **User** – shall mean the person using Trainers.org.

### Cookies

Cookies are small files sent by the websites to the browser and stored on the User's device, e.g. computer, mobile phone, tablet. Among other things, they enable the websites to store and download information about the user's preferences or his/her equipment in terms of browsing websites or to recognize the User and improve the services offered.

### Types of cookie files

Cookies can be divided into different categories, in accordance to the examples below.

Depending on the duration (of the activity in the browser) we can distinguish session and persistent cookies. Persistent cookies are used while browsing the website and stored only during the given browsing session, that is until the end of the browsing session. Permanent cookies are stored for a specified period of time, even after the User's browsing of the website.

Depending on the entity who holds them we can distinguish own and third party cookies (of external entities). Own cookies are created by the domain of the website visited by the user (indicated in the browser's address bar) and can only be accessed by this domain. Third party cookies (of external entities) are created and managed by the domains other than the website visited. They are usually used to track the users on various websites, so that the users can receive tailored advertising.

Depending on the purposes we can distinguish technical, analysis and personalization cookies. Technical cookies are considered necessary for the proper functioning of the website, and therefore also the services offered as part of it. Analysis cookies are used to anonymously research and learn about the users' behavior when browsing the website. Personalization cookies allow the website to use a general set of predefined features (e.g. language, type of browser used) for each user.

## Cookies used by Trainers.org

Trainers.org, in addition to the necessary technical cookies that enable the use of many of the basic functions of Trainers.org., also uses cookies for other purposes, such as:

- improving the quality of services provided to the Users;
- understanding the behavior of website's Users and analyzing information for statistical purposes;
- improving security and preventing fraud;
- increasing the speed of the website.

Cookies used by Trainers.org:

Cookie file	Description	Duration of use	Source
Local Storage	Technical cookie file used to store information about the language and the cities from which the users access the website (anonymously through a random identifier) to improve their experience related to using it	Undefined	–
_utma	Analysis cookie file identifying individual guests. It is used to register individual guests for statistical and analytical purposes.	2 years	Google (Analytics)
_utmb	Analysis cookie file responsible for storing information about a given visit. It is used to record individual visits for statistical and analytical purposes.	30 minutes	
_utmc	Analysis cookie file responsible for determining whether to start tracking a new visit or whether the collected data should be attributed to the old one. For this purpose, it cooperates with _utmb.	For the duration of the browser session (individually for each user)	
_utmz	Analysis cookie file identifying the sources of individual visits. It is used to record individual sources of visits for statistical and analytical purposes.	6 months	
_utmv	Analysis cookie file identifying individual guests. It is used to register individual guests for statistical and analytical purposes.	2 years	

Moreover, Trainers.org uses data from SALESmanago cookies (owned by Benhauer Sp.z o.o.) to optimize content for the user, monitor traffic and analyze it. The details are available at: <https://support.salesmanago.com/contact-monitoring-principles-of-operation-and-scope-of-collected-data/>

Trainers.org platform also uses data from Google Maps (owned by Google Inc.). If the user provides a registered address when completing data in his profile, Google also stores the IP address on a server

in the USA. We enable the use of Google Maps in order to help find the cities provided by the users on the website.

Trainers.org also uses social networks to make using the website more attractive for the users. Logging in with the Google or Facebook account is available, as well as providing links to the users' social media profiles as part of the trainer's profile on the website. Thus, the Trainers.org platform uses cookies from the websites such as Facebook, Twitter, Youtube, LinkedIn or Google.

Trainers.org provides the option of using social features, such as sharing the content on social networks. Using these functions involves the use of cookies of the administrators of social networks, such as Facebook, YouTube, Twitter, Google+, LinkedIn.

The website may contain links to other websites. For more information about cookies on third-party websites, please get acquainted with their cookie policy.

### **Cookies management**

The User may specify the conditions for the storage of cookies with the help of the web browser's settings.

### **Purposes of data processing and the legal basis for their processing**

1. The data collected during the Registration shall be processed for the following purposes:
  - a. provision of Services and maintenance and operation of the User's Account on Trainers.org - the legal basis is:
    - Article 6(1) point b) of the GDPR read together with the act of 18 July 2002 on rendering electronic services – for the purpose of performing the contract and taking action before the conclusion of the contract;
    - in terms of the data provided by the Users voluntarily – Article 6(1) point a) of the GDPR – the User's consent;
  - b. commercial and marketing – the legal basis is:
    - in terms of sending the newsletter – Article 6(1) point b) of the GDPR - performing the contract and taking action before the conclusion of the contract;
    - in terms of presenting the marketing content in the newsletter and on Trainers.org – Article 6(1) point f) of the GDPR - the legitimate interest of the Controller and third parties in promoting their own brands and Article 6(1) point a) of the GDPR – the consent. It also includes profiling, that is customizing the offer, e.g. selection of the advertising content in the newsletters as part of the user's searches on the website or selection of the content as part of the pop-ups displayed on the website.
  - c. statistical and analytical - the legal basis is Article 6(1) point f) of the GDPR - the Controller's legitimate interest in conducting User activity analyzes at Trainers.org in order to improve the functionalities used;
  - d. possible determination, pursuing and defense against claims - the legal basis is Article 6(1) point f) of the GDPR - the Controller's legitimate interest in defending his rights.
2. The data of the Users (registered and not registered) using Trainers.org shall be processed for the following purposes:
  - a. provision of Services – the legal basis is Article 6(1) point b) of the GDPR read together with the act of 18 July 2002 on rendering electronic services – for the purpose of performing the contract and taking action before the conclusion of the contract;
  - b. commercial and marketing – the legal basis is:
    - in terms of sending the newsletter – Article 6(1) point b) of the GDPR - performing the contract and taking action before the conclusion of the contract;
    - in terms of presenting the marketing content in the newsletter and on Trainers.org - Article 6(1) point f) of the GDPR - the legitimate interest of the Controller and third parties

- in promoting their own brands and Article 6(1) point a) of the GDPR – the consent. It also includes profiling, that is customizing the offer, e.g. personalized offers, promotions, discounts.
- c. statistical and analytical - the legal basis is Article 6(1) point f) of the GDPR - the Controller's legitimate interest in conducting User activity analyzes at the website in order to improve the functionalities used;
  - d. possible determination, pursuing and defense against claims - the legal basis is Article 6(1) point f) of the GDPR - the Controller's legitimate interest in defending his rights.
3. The data of the Users provided in the contact form shall be processed for the following purposes:
- a. identifying the sender and handling his inquiry sent via the contact form - the basis for processing is:
    - in terms of data necessary to establish contact or handle the inquiry – Article 6(1) point b) of the GDPR – necessity of the processing for the performance of the contract;
    - in terms of data which is not necessary to establish contact or handle the inquiry – Article 6(1) point a) of the GDPR – the User's consent.
  - b. statistical and analytical - the legal basis is Article 6(1) point f) of the GDPR - the Controller's legitimate interest in conducting User activity analyzes at the website in order to improve the functionalities used;
  - c. possible determination, pursuing and defense against claims - the legal basis is Article 6(1) point f) of the GDPR - the Controller's legitimate interest in defending his rights.

#### **Data recipients**

In connection with the provision of Services, the Users' personal data will be disclosed to the employees, associates and external entities to the extent necessary for the proper operation of Trainers.org and the efficient service for the platform users, that is in particular:

1. technical service providers who can operate the technical infrastructure needed to provide services on Trainers.org, in particular the providers who host, store and maintain Trainers.org website, its content and personal data processed, and who manage the infrastructure;
2. partners who support the Controller in providing marketing services, including sending promotional messages about the products offered on Trainers.org, who hold the competitions, promotions;
3. providers rendering accounting services, electronic payment services, providing marketing systems, systems analyzing traffic at Trainers.org, systems for analyzing the effectiveness of marketing campaigns;
4. entities associated with the Controller.

#### **Transfer of data to third countries or international organizations**

The Controller shall not transfer personal data to third countries or international organizations.

#### **Duration of data storage**

The duration of data processing by the Controller depends on the type of service provided and the purpose of processing. Generally, data are processed for the duration of Service, until the consent is withdrawn (if the processing is based on consent) or until an effective objection to data processing is raised in cases where the legal basis for data processing is the Controller's legitimate interest.

The duration of data processing may be extended if the processing is necessary for the determination, pursuing or defense against possible claims, and after this period only if and to the extent required by law. After the expiry of the processing period, the data is irreversibly deleted or anonymized.

### **User's Rights**

1. The User shall have the right to access his personal data, rectify it, delete it ("the right to be forgotten") or limit the processing and the right to object to the processing, the right to transfer data to another controller.
2. If the processing is based on consent, the User shall have the right to withdraw his consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.
3. If the User decides that the processing of personal data violates the provisions of the GDPR, he shall have the right to lodge a complaint with the President of the Personal Data Protection Office.
4. Providing personal data by the User is always voluntary, but necessary to conclude with the Controller the contract for the provision of electronic services, and thus to use Trainers.org, to receive a newsletter or for the Controller to exercise other functionalities related to the use of Trainers.org.

### **Securing personal data**

The Controller shall make every effort to properly secure the personal data provided and to protect the privacy of the users, in particular against the disclosure to unauthorized persons.

### **Amendments to the Privacy and Cookies Policy**

We reserve the right to change the Privacy and Cookies Policy by publishing the new privacy and cookies policy on Trainers.org. At the same time, we will inform you about it through the newsletter and a message visible on our website.

### **Contact**

If you have additional questions about privacy protection, the use of cookie files and the rules for using Trainers.org, as well as when you want to exercise the Users' rights, please contact the Controller at [info@trainers.org](mailto:info@trainers.org) or via the [contact form](#) available at Trainers.org.