



## Privacy Notice

This is the privacy notice of 1MM Media ltd T/as Gonic Poland is a company registered in England and Wales under company number 07235735. In this document, "we", "our", or "us" refer to 1MM Media ltd. For the purposes of data protection legislation, the "Data Controller" is 1MM Media ltd whose registered office is at 84 Uxbridge Road, W13 8RA London.

'the website' refers to the website found at the domain [www.gonic.com](http://www.gonic.com)

'customer' refers to any company or individual who purchases services from us or who, by entering information or making an enquiry at our website, sends an email to us or calls us to express an interest in purchasing services from us

'services' refers to sale by us and purchase by the Customer of a printed advertisement or series of advertisements in Gonic Poland magazine, or a website advertisement.

### ***Introduction***

1. This is a notice to inform you of our policy relating to all the information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. This includes where you visit or use our online services and we collect your personal information, it also relates to our use of any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website and users of our services are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party. We undertake to preserve the confidentiality of all information which you provide to us.
3. This policy complies with the EU Data Protection Directive (95/46/EC), implemented as the General Data Protection Regulation (GDPR), which came into force from 25<sup>th</sup> May 2018. In the UK, the legal provisions of the GDPR are incorporated in the Data Protection Act 2017, making it applicable after the UK leaves the European Union.
4. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website or otherwise.

## ***The bases on which we process information about you***

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category. These are notified under Sections 1 to 3 of this Notice.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **1. Information we process because we have a contractual obligation with you**

When you create an account on our website Goniec.com or otherwise agree to our Terms and Conditions in order to use our services, a contract is formed between you and us.

In order to carry out our obligations under that contract, we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. provide you with our services
- 1.2. provide you with advice about our products, advice on how to use our services and to obtain the most from using our website
- 1.3. maintaining a record of our communications with you if you get in contact with us.

We process this information on the basis that there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance in providing our services. If we use it for this purpose, you as an individual will not be personally identifiable.

If you continue to use our services once you have agreed our Terms & Conditions, we do not have to seek your consent to use data about you because our contractual

relationship is the legal basis for doing so. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **2. Information we process with your consent**

Through certain actions, when there is no contractual relationship between us (such as when you browse our website or ask us to provide you with more information about our business, including our products and services), you provide your consent to us to process information which may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor performance in providing our services.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [redakcja@goniec.com](mailto:redakcja@goniec.com). However, if you do so, you may not be able to use our website or our services further.

## **3. Information we process because we have a legal obligation**

We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

## **4. How we use cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

We ask for your consent to use cookies. If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 4.1. to track how you use our website
- 4.2. to record whether you have seen specific messages we display on our website
- 4.3. to keep you signed in our site
- 4.4. to improve the quality and relevance of the messages we send you

The following describes the cookies we use on this site and what we use them for:

Provider	Name	Purpose	More Info	Expires
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Google Privacy policy</a>	
our	sessionid	Hashed session id		On exit
	csrftoken	CSRF token to	<a href="#">CSRF Doc</a>	On exit
	OAID	Advertising		1 year
Google Maps	PREF NID	Various unique identifiers, except for PREF which stores user's options such as preferred zoom level.	<a href="#">Google Privacy policy</a>	Most of the cookies expire 10 years after your last visit to a page containing a Google Map (exceptions: PREF – about 22 months, NID – about 5 months)
ISSUU	iutk	PDF reader emdedded in goniec.om	<a href="#">Issuu</a>	
Google	OTZ	Unverified actions but source is: apis.google.com		About 3 months

## **5. Your rights under data protection law**

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We briefly set out these rights here, but we would ask that you also read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).

You have the right to request the erasure of your personal data unless we have reasonable grounds to refuse the request. You have the right to request the correction of data inaccuracies; to make an access request for the personal information we hold about you; to be provided with a copy of it electronically in a commonly used format; and/or to request its transfer to another data controller.

You have the right to object to how your personal data is used, as described elsewhere in this Notice. You also have the right to restrict the processing of your information, which you may wish to do (instead of your data being erased) if, for example, it is no longer necessary for us to use it, or if you tell us that the data is incorrect. You have the right not to be subject to a decision based solely on automated processing, including profiling, which significantly affects you, unless we carry out such decision-making and profiling for legitimate and lawful reasons. You also have the right to complain to the Information Commissioner's Office (the 'supervisory authority' in the UK for data protection law) about how your personal information is used.

### ***Access to and removal of your own information***

## **6. Access to your personal information**

- 6.1. At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.
- 6.2. To obtain a copy of any information that is not provided on our website, you may send us an access request at [redakcja@goniec.com](mailto:redakcja@goniec.com)
- 6.3. After receiving the request, we will tell you when we expect to provide you with the information, which will normally be within one month from your request (or up to two month in the case of a complex request). We will also tell you whether we require any fee for providing it to you.

## **7. Removal of your information**

If you wish us to remove personally identifiable information from our website, you

may contact us at [redakcja@goniec.com](mailto:redakcja@goniec.com). This may limit the service we can provide to you.

We may refuse such a request if we have reason to believe it conflicts with our legal obligations or is otherwise made to frustrate law enforcement.

## **8. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information, we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **9. Sending a message to us**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business.

We do not keep any personally identifiable information associated with your message, such as your name or email address, unless we already have a contractual relationship with you as our customer.

## **10. Complaints**

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## ***Use of information we collect through automated systems when you visit our website***

### **11. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address, length of visit and number of pages viewed. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website, how we perform in providing content to you, and to improve our website's usability.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

### **12. Automated decision making and profiling**

You have the right not to be subject to an automated decision, without human intervention, based solely on the automated processing of your personal data, including profiling, which produces legal effects concerning you or similarly significantly affects you. Although such decisions are permitted by data protection legislation if they are authorised by EU or national law which applies to us and if they are necessary for entry into or performance of a contract, our decisions about you, including profiling decisions, are not taken without human involvement. They are always taken in compliance with legal requirements.

### **13. Disclosure of your information**

We will not provide your personal information to any third parties (except to One Money Mail Ltd of which company we are a wholly owned subsidiary) for the purposes of direct marketing without your explicit permission. We may send you by email or text message information which we may think will be of interest to you. We will only do this if you have explicitly consented.



We do not have third party advertisers on our own websites, who use technology that automatically collects data about you when advertisements are displayed (and over which we have no control). We accept no liability for the privacy policy of any other website to which ours may be linked, or the information practices of third parties.

In addition to the disclosure reasonably necessary for the purposes explained in this Notice, we may disclose information about you:

- 13.1. to the extent that we are required to do so by law;
- 13.2. in connection with any current or prospective legal proceedings;
- 13.3. in order to establish, exercise or defend our legal rights or obligations
- 13.4. to give effect to, administer or enforce a service requested by you.

## **14. Data processing**

Your data is held on secure servers operated by 1MM Media Ltd in the UK, and is stored using robust security measures.

We will keep your data safe and secure. To prevent unauthorised access, maintain accuracy and ensure the correct usage of information, we monitor and adjust our physical and electronic procedures to safeguard and secure your personal data while in our care

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America. For this reason we ensure that our contracts with data processors include transfer clauses in line with the data protection requirements of the GDPR.

## ***Other matters***

## **15. Use of site by children**

We do not provide our services to children, nor do we market to children.

## **16. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt all the information which you provide to us.

Whenever information is transferred between us, you can check that it is done using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

We take all reasonable precautions to prevent the misuse, loss, destruction or alteration of your personal information, or the unlawful processing of it. You should ensure that you keep secret the security information which we provide to you, and take all reasonable precautions to prevent its unauthorised or fraudulent use.

## **17. How you can complain**

17.1. If you are not happy with our privacy policy or if you have any complaint then you should tell us by email. Our address is [redakcja@goniec.com](mailto:redakcja@goniec.com)

17.2. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

## **18. Links to other websites**

Our website provides links to resources that we believe may be useful. These links will lead you to websites operated by third parties that operate under different privacy policies.

Should you choose one of these links you will be leaving our website for a site over which we have no control.

## **19. Retention period for personal data**

We keep your personal information only for as long as required by us:

19.1. to provide you with the services and products you have requested;

19.2. to fulfil our obligations under any contract you have with us;

19.3. to comply with applicable law.

We review our retention periods for personal information regularly. If you have not interacted with us in any way, we will no longer hold your information after 5 years. Sometimes we may need to keep it for longer periods such as tax and other financial regulatory reasons; this would typically be 7 years. We would only keep it for longer than this if we are required to by law.

If you request for us to no longer contact you, for example with marketing communications, we will retain the minimum amount of information about you so that we can ensure we remove you from any future communications. Please note that if you ask us to completely remove all information about you, and you subsequently use our products and services at a later date, we will no longer be able to recognise your previous request to not be contacted, which is why we would keep it and suppress it in line with industry standards.

## **20. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.