

Privacy Policy of Blue Media S.A.

This Privacy Policy is meant to help you understand who is the controller of your personal data and what is the purpose, scope and duration of the data processing. You will get to know who and on what basis we share your personal data with and what rights you may exercise in relation to the processing of such data.

This Privacy Policy has been designed in a way which enables you to find all information that corresponds to the requirements of the 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 (GDPR).

For the purpose of this Privacy Policy 'data' means your personal information that were received directly from you or that we obtained from other sources, inter alia, your name and surname, e-mail address or telephone number.

Who is the data controller?	The controller of your data is Blue Media S.A. with its registered office in Sopot at ul. Powstańców Warszawy 6, registered in the District Court Gdańsk-Północ, 8th Commercial Division of the National Court Register, under KRS number 0000320590, with share capital in the amount of PLN 2,000,000 fully paid-up, holding NIP number 5851351185, entered into the Register of National Payment Institutions under No. IP17/2013, the Register of Credit Intermediaries under No. RPK002057 and into the Register of Communications Service Providers under No. 11050.
How can I contact you in cases related to the personal data?	We have designated a Data Protection Officer to supervise the processing of our Clients' data. You may contact the Data Protection Officer by e-mail sent to odo@bm.pl or in writing sent to the following address: Blue Media S.A., ul. Powstańców Warszawy 6, 81-718 Sopot, with a note: 'data protection'.
When do you process my personal data?	We collect your personal data each time when you use our services, for instance, when you top up your mobile account via our services, pay bills, make an online purchase, apply for a loan or participate in contests and promotions that we organise. Your personal data are also processed each time when you contact us or file a complaint. We process your data as well when we send you marketing information concerning us or our business partners. We may also process your data upon request of other entities who provide services for you and act as controllers of your personal data, for instance, your bank or your mobile network operator.

<p>Do I have to provide you with my personal data?</p>	<p>The provision of your personal data is voluntary, however, in some cases, may be necessary to enter into the contract and perform the services properly or to be in compliance with our legal obligations.</p>
<p>What type of data do you process?</p>	<p>We process the personal information that have been received directly from you, as well as the information that have been collected or generated by us (for instance: by using cookies or other technologies) or the information that have been disclosed by other controllers of your data, inter alia, your bank, other payment services providers, loan institutions, mobile network operator or a payment recipient.</p> <p>We also process the data stored on the device you use while using our services (cookies).</p> <p>We are taking steps to limit data processing only to the data which are necessary for the purpose for which they have been collected (data minimisation).</p> <p>For example:</p> <ol style="list-style-type: none"> 1. If you top – up your mobile account via our services, we collect, inter alia, information about your transaction (bank account, recipient’s data) telephone number and, in some cases, e-mail address and name of a mobile network operator. 2. If you use our payment services, we collect, inter alia, data related to the transaction (bank account, payer’s and recipient’s data, transaction title), e-mail address, IP of the device you use to order the transfer and, in some case, if it is required by law, more precise data concerning the payer and the beneficial owner. 3. If you use our loan or other financial services, we process, inter alia, your name and surname, domicile address, contact data, ID number and its expiry date, your financial situation or information obtained as a result of the verification. 4. If you participate in our contests, we collect, inter alia, your contact data, domicile address, name and surname and, in particular cases when you win a cash award, your bank account. 5. If we communicate with each other via phone, our conversation is registered, which you are informed about at the beginning of each phone call.
<p>For what purposes do you process my personal data?</p>	<p>Your data are processed, first of all, in order to conclude and perform agreements such as, for example, user account agreement, loan agreement or payment service agreement. It relates also to actions such as, inter alia, claim reviews, your credit capacity assessment or any actions taken upon your request prior to the conclusion of the agreement.</p>

	<p>In cases concerning some technical issues, for example, when you encounter problems with activating our services, we might contact you, when necessary, on an unsolicited basis.</p> <p>Some of your data may be processed in order to comply with legal obligations concerning, inter alia, the duty to store certain data for a determined period of time, collect some information in order to verify and identify the user or providing some information to the authorities or other authorised entities, stemming from such legal acts as, for instance: Act on Payment Services, The Consumer Credit Act, Anti – Money Laundering and Counter-Terrorism Financing Act, tax law, The Accounting Act, Act regulating the complaint handling procedure used by financial services providers and the Polish Financial Ombudsman activity, Act on alternative dispute resolution for consumer disputes or Telecommunication Act.</p> <p>We also process your data for other legitimate purposes, for instance:</p> <ol style="list-style-type: none"> 1. to track your activity in our services (by using cookies or other technologies), 2. to profile your preferences and needs (also by using cookies) in order to customise your trade offers to your interests, 3. for direct marketing of our products and services– it enables us to inform you about our trade offers, 4. to establish, exercise and defend our legal rights resulting from our business activity, 5. to check, detect and prevent potential fraud and other illegal activity which may be committed by means of our services. <p>We can send you our newsletter or present you our new offers by phone, e-mail or by sending message to your mobile phone, if you have consented to this.</p> <p>If you participate in our contests or other forms of promotions, your personal data are processed, under your consent, for the purpose of organising the contest or promotion, establishing the winners and awarding the prizes.</p> <p>If you interested in our Partners’ trade offers and grant your consent to receive them, we may send you, on behalf of our Partners, our Partners’ commercial information or enable them to send such information by themselves by disclosing your personal data.</p> <p>If we decide to process your personal data for other purpose than that for which your personal data have been collected, you will be informed about the new purpose and asked to grant a consent to such processing provided that such consent is required under the law.</p>
<p>What is the legal basis for the processing of my personal data?</p>	<p>The legal basis for the processing of personal data:</p> <ol style="list-style-type: none"> 1. conclusion and performance of the agreement or

	<ol style="list-style-type: none"> 2. the consent you have granted or 3. fulfilment of the controller's legitimate interest, or 4. fulfilment of the duties imposed by the virtue of law, which are, depending on the type of the service performed, inter alia: <ol style="list-style-type: none"> 1. Act on Payment Services of 19 August 2011 2. The Accounting Act of 29 September 1994 3. The Goods and Services Act of 11 March 2004 4. Anti – Money Laundering and Counter-Terrorism Financing Act of 16 November 5. The Banking Act of 28 August 1997 6. The Consumer Credit Act of 12 May 2011 7. Act on electronically supplied services of 18 July 2002 8. Telecommunications Act of 16 July 2014 9. Act regulating the complaint handling procedure used by financial services providers and the Polish Financial Ombudsman activity of 5 September 2015 10. Act on alternative dispute resolution for consumer disputes of 23 September 2016 <p>Your personal data are processed in compliance with binding provisions of law relating to data protection, including RODO.</p>
<p>For how long will you process my personal data?</p>	<p>We will process your data no longer than is necessary.</p> <p>The duration of such processing differs depending on the type and purpose of the collected data:</p> <ol style="list-style-type: none"> 1. The data collected in order to conclude and perform the agreement will be processed until the completion of the agreement and the period of securing potential claims. 2. The data collected for certain purpose under your consent will be processed until granted consent is withdrawn. 3. The data that are processed in order to fulfil the legitimate interest will be processed until the fulfilment of such interest. In some specific cases which relate to the direct marketing, including profiling, not later than until effective objection is lodged.

	<p>4. The data necessary for compliance with a legal obligation will be processed no longer than is required by law.</p>
<p>To whom you may disclose my personal data?</p>	<p>We do not disclose your personal data to anyone, unless:</p> <ol style="list-style-type: none"> 1. You give your consent to such disclosure. Your consent may be withdrawn at any time. 2. The disclosure is necessary in order to perform the service. The recipients of your personal data may be: <ol style="list-style-type: none"> 1. Mobile network operators – data necessary to top up your device, for example, your mobile phone, 2. Bank or other payment service provider– data necessary to perform the payment service, 3. Economic and credit information bureaus – data necessary to assess your creditworthiness, 4. Recipients of payments – data related to your transfer order, 5. In particular cases your data may be disclosed to the third parties authorised to demand access and receive such data on the grounds of the law (e.g. law enforcement authorities or other payment services providers). Each demand is examined thoroughly. We will disclose your data only if the results of such examination provides us with binding legal grounds for disclosure of such data. <p>You need to be aware that we outsource some of our tasks like documents’ destruction, storage of data or marketing services etc. to our subcontractors. In such cases, we share your personal data with subcontractors for a specific purpose, however we still remain your data controller and we are still responsible for the security of your data.</p> <p>We do not transfer your personal data to third countries.</p>
<p>Will my data be processed automatically? (including profiling)?</p>	<p>In order to perform some of our services, we use automated decision process.</p> <p>For the purpose of concluding credit or other financial services agreements our decisions are based on profiling.</p> <p>It concerns the assessment of creditworthiness basing on the information you provided us with or the information we obtained, for instance, from economic and credit information bureaus.</p> <p>If your creditworthiness is assessed to be insufficient, such profiling may result in credit or other source of financing refusal.</p> <p>When providing payment services we also take automated decisions due to the security of electronic payments reason.</p>

<p>How do you protect my personal data?</p>	<p>We take full responsibility for the security of the personal data that we process.</p> <p>We use appropriate technical and organisational measures in a manner that ensure the security and confidentiality of your personal data, including protection against unauthorised and unlawful processing and against accidental loss, destruction or damage of the data processed.</p> <p>In order to protect your personal data we use the most advanced technologies, which not only fulfil the basic legal requirements, but also constitute the additional security measures which enhance your personal data security. As basic security measures we use security channels, (e.g. SSL protocols) data encryption and other technical and operational measures (e.g.: restricting and controlling access to data).</p> <p>We ensure that your personal data are processed exclusively by the authorised natural person or authorised entities.</p>
<p>What are my rights?</p>	<p>As a consequence of the fact that you provide us with your personal data, you can exercise the following rights:</p> <ol style="list-style-type: none"> 1. You have the right to obtain from us the information as to whether or not your personal data are being processed and if so for what purpose, the categories of personal data concerned, the categories of the recipients to whom the personal data have been disclosed and the envisaged period for which the personal data will be stored. 2. At any time, you have the right to access to the personal data that we process as well as the right to obtain from us the rectification of inaccurate personal data or to have incomplete personal data completed. 3. You have the right to request from us the erasure of personal data. We will erase your personal data upon your request without undue delay unless we need to fulfil the obligation required under the law or your personal data are necessary to establish, investigate and secure our potential claims. We will erase your data when: <ol style="list-style-type: none"> 1. there are no longer necessary in relations to the purposes for which they have been collected or otherwise processed, 2. the processing of the data was based on the consent which you withdrew and there is no other legal ground for the processing, 3. you have objected to the processing of data which have been collected in order to fulfil the legitimate interest of the controller and there are no overriding legitimate grounds for the processing, 4. the personal data have been unlawfully processed, 5. the personal data have to be erased to comply with a legal obligation.

4. If the processing is based on your consent, you may withdraw it at any time. The processing will then be lawful until the moment of withdrawal.
5. You have the right to obtain from us the restriction of processing of your personal data when one of the following applies:
 1. the accuracy of the data is contested by you, the restriction then lasts for a period enabling us to verify the accuracy of the personal data;
 2. the processing is unlawful and you oppose the erasure of the personal data;
 3. we no longer need your data for the purposes for which your personal data have been collected however you require them for defending your rights or exercising legal claims;
 4. you have objected to processing, the restriction then lasts for a period enabling us to verify whether our legitimate grounds override yours.
6. You have the right to object to processing of the personal data which have been collected in order to fulfil the legitimate interest of the controller.
 1. We will cease the processing immediately, unless a ground which overrides the objection exists.
 2. Your objection will be effective when it relates to processing of the personal data for direct marketing including profiling to the extent that is related to such direct marketing.
7. In order to perform some of our services, it is necessary for us to collect specific types of your personal data. Therefore, when exercising your rights indicated in point 3-6 above, we may stop performing some of our services.
8. You have the right to receive the personal data which you have provided us with in a machine-readable format and the right to transmit those data to another controller. The above -mentioned right applies to automatically collected data which are processed on the basis of:
 1. your consent,
 2. the agreement.
9. If you claim that your rights have been breached, you are entitled to lodge a complaint to the supervisory authority, which is the General Inspector for the Protection of Personal Data (Generalny Inspektor Ochrony Danych Osobowych) or his successor the Chairman of the Office for Protection of Personal Data (Prezes Urzędu Ochrony Danych Osobowych).

	<p>10. You have the right not to be subject to a decision based on an automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. We may however use an automated processing if the decision:</p> <ol style="list-style-type: none"> 1. is necessary for entering into or performance of a contract, 2. is authorised by law, or 3. is based on your consent. <p>11. If you become the subject to a decision based on an automated processing, including profiling, you have the right to obtain help from our employee who will perform an additional verification of your situation and the grounds of the decision. You may then express your point of view and contest the decision.</p>
<p>What are cookies?</p>	<p>Cookies are computer data, especially small pieces of text, which are saved and stored in the memory of the device that you use to visit our web services.</p>
<p>How do you use cookies and other tracking technologies?</p>	<p>Cookies and other tracking technologies allow us to store information or access to information which are placed on the device that you use to visit our services. Cookies help us to adjust our services according to your own preferences and enables us to watch and track you activity in our services.</p> <p>Cookies which we use do not compromise the security of your device and are free from any malicious or unwanted software.</p> <p>Cookies contains the name of the domain cookies belong to, their expiration date and their value. Under no circumstances do they allow to download the information from you device. They only allow to gain access to certain information.</p>
<p>What are the types of cookies?</p>	<ol style="list-style-type: none"> 1. We use various types of cookies which differ from each other when it comes to their nature and duration. Depending on the length of time cookies stay on your device, we can distinguish the following types of cookies: <ol style="list-style-type: none"> 1. session cookies – which are stored on your device and expire at the end of your browser session. Saved information are then erased from the memory of your device. 2. persistent cookies – which stay on you device until they expire or are deleted. The end of your browser session does not result in erasing the cookies from your device. 2. When it comes to their origin, we can distinguish the following types of cookies: <ol style="list-style-type: none"> 1. first – party cookies – which are set on our services directly by us;

	<ol style="list-style-type: none"> 2. third – party cookies – which are set on our web services by third parties whose websites’ components have been allowed by us (e.g. Google Analytics, Gemius SA, Crazy Egg)
<p>For what purpose do you use technologies such cookies?</p>	<p>We use cookies for the following purposes:</p> <ol style="list-style-type: none"> 1. to change our services in order to adjust their content and functionalities to your preferences and enhance their work, 2. to verify the identity of our services’ users in order to keep them logged in– it let the users to navigate between pages within the web service without the necessity to log in every time after changing each page, 3. to create anonymous statistics which help us assess the quality of our web services use – to improve the structure and content of our services, 4. to gain the information about the website from which you were transferred to our service, 5. to customise the advertisements which are displayed in our web services, 6. to ensure security and reliability of our services
<p>How can I manage my cookie consent?</p>	<p>We can use cookies in order to store the information or gain access to the information stored in your device only on the basis of your consent. Your consent is not required when the use of cookies for the above-mentioned purposes is necessary for telecommunications or electronically supplied services performed upon your request, you will be asked for the consent however when such activity will result in the necessity to install a certain type of software on your device.</p> <ol style="list-style-type: none"> 1. You can give consent to the use of cookies by changing software settings, e.g. changing the setting of your web browser or the device used to use our services. 2. You can reject cookies or withdraw your consent to the use of them at any time by changing the settings of your browser or your device’s software. 3. As standard, the software which enable you to use our services (mainly internet browsers) by default accepts using and saving cookies on your device. Therefore, we recommend you to check the settings and make the changes in according with your preferences. You can alter the setting of your browser to prevent automatic acceptance. 4. If you accept the settings of your software allowing cookies it means that you give consent to our use of cookies in accordance with the provision included herein. In such situation we will be entitled to use

	<p>cookies and other tracking technologies to store the information or gain access to the information stored on your device.</p>
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5. If you decide to turn off the capacity to save cookies, you may encounter some difficulties when using certain functions and features of our services.