

## PRIVACY POLICY



**Jacek  
Lewinson**

The JACEK LEWINSON Privacy Policy is a document posted on the website <http://www.jaceklewinson.com/about> to inform customers of the scope and manner of protecting their personal data used for, among other things, sending the Newsletter.

The privacy policy complies with applicable legislation, primarily:

1. [Constitution of the Republic of Poland \(Articles 47, 51\)](#)
2. Regulation (EU) 2016/679 of the European Parliament and 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), hereinafter GDPR
3. The Act on the Protection of Personal Data in Poland
4. The Act on electronic provision of services
5. The Act on combating unfair competition
6. Telecommunication Law
7. Labour Code
8. Civil Code
9. Penal Code
10. Other legal provisions governing the processing of personal data.

**1. Who is the Controller of my personal data?**

Jacek Lewinson conducting business activities under the name of Jacek Lewinson, at ul. Nowogrodzka 18/20,00-511 Warsaw, NIP: 5261369089, REGON: 015201913 (hereinafter: **the Controller**) is the Controller of the personal data of all customers of the said business entity.

**Contact details of the Personal Data Controller:**

**Jacek Lewinson conducting business activities under the name Jacek Lewinson**

Address: ul. Nowogrodzka 18/ 20, Warsaw 00-511 Phone:+48 502 603 290 e-mail:  
jacek@jaceklewinson.com

The controller is responsible for the use of personal data in a secure manner and in accordance with the applicable legislation.

The obligation to present this information clause to Customers stems from the provisions of Regulation (EU) 2016/679 of the European Parliament and 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, hereinafter: the GDPR).

**2. Who can I contact about issues relating to the processing of my personal data?**

The Controller has appointed a Data Protection Officer who can be contacted via email [rodo@jaceklewinson.com](mailto:rodo@jaceklewinson.com) , by telephone + 48 502 615 752 or by writing to: Jacek Lewinson ul. Nowogrodzka 18/ 00-511 Warsaw.

In addition, in all matters relating to the processing of your personal data by the Controller, you can contact the Controller:

at the e-mail address [rodo@jaceklewinson.com](mailto:rodo@jaceklewinson.com)

by telephone: + 48 502 615 752

or in person by appointment at the registered office of the entity operating under the name Jacek Lewinson.

**3. What is the source of my data – where is it obtained from?**

We obtain personal data directly from you – you give it to us, e.g. when you sign up via the TBIS form, when you agree to our newsletter mailing, when you contact us to enquire about a specific book, and when you order the books we offer, etc.

**4. What is the scope of the personal data processed by the Controller, the purpose of the processing and the period of storage of the personal data?**

As we provide different services, we process your personal data for different purposes, to different extents and on different legal bases as defined in GDPR. In addition, depending on the purpose for which your personal data is processed, the duration of the processing varies. In order to provide you with the clearest possible information, we have grouped your personal data by reference to the purpose of processing.

**Purpose of processing: Contact with lecturers to send free samples of books**

**Scope of data:** Name, address, residential address, telephone, place of employment

**Legal basis:** Legitimizing premise: Article 6(1)(b) of the GDPR, i.e. taking steps at the request of the data subject prior to entering into a contract

**Period of storage of personal data:** Personal data is deleted by the Controller 3 years after the last contact.

**Purpose of processing: Implementation of contracts with publishers and bookshop operators**

**Scope of data:** Name and surname, job title (and information about the company where the person is employed), business correspondence address, business e-mail address and business telephone number

**Legal basis:** Legitimizing premise: Article 6(1)(b) of GDPR, the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

**Period of storage of personal data:** The personal data of Customers (booksellers, publishers) will be stored for the duration of the business relationship, as well as after its termination when there are reasonable indications that the relationship will be resumed.

**Purpose of processing: Handling correspondence with existing and potential customers via the TBIS form**

**Scope of data:** Name, surname, e-mail address, telephone number, nickname, job title, name of organization, name of country

**Legal basis:** Legitimizing premise: Article 6(1)(a) of GDPR – i.e. consent of the data subject

**Period of storage of personal data:** Data is processed until the data subject withdraws his or her consent.

**Purpose of processing: Collection of personal data of customers in the VACLAV database**

**Scope of data:** Name, surname, job title, telephone number, e-mail address

**Legal basis:** Legitimizing premise: Article 6(1)(a) of GDPR i.e. consent of the data subject

**Period of storage of personal data:** Data is processed until the data subject withdraws his or her consent.

**Purpose of processing:** Sending a newsletter

**Scope of data:** Name, surname, image, telephone number, e-mail address

**Legal basis:** Legitimizing premise: Article 6(1)(a) of GDPR i.e. consent of the data subject to marketing activities;

**Period of storage of personal data:** Data is processed until the data subject withdraws his or her consent.

**Purpose of processing:** Establishment and defence of own claims. Own accounting

**Scope of data:** Name, surname, company name, residential address, tax identification number (NIP), statistical (REGON), personal ID number (PESEL), data of an accounting, bookkeeping or financial nature or data relating to a claim being asserted

**Legal basis:** Legitimizing premise: Article 6(1)(c) of GDPR in connection with Article 74(2) of the Accounting Act ,Article 6(1)(f) of GDPR, as the so-called legitimate interest – the assertion of claims and defence of rights

**Period of storage of personal data:** The data is processed for the period of limitation of claims under the Civil Code. All the data processed for accounting purposes and for tax reasons is processed for five years calculated from the end of the calendar year in which the tax liability arose. After the said periods, the data is deleted or anonymized.

**Purpose of processing:** Statistics on the use of the various functionalities of the Jacek Lewinson website

**Scope of data:** Activity on the Jacek Lewinson website, the pages and sub-pages visited, the amount of time spent on each page, search history data, IP address, location, device ID and browser and operating system data

**Legal basis:** Legitimizing premise: Article (6)(1)(f) of GDPR. The basis for the processing of personal data is the legitimate interest of the Administrator which relates to facilitating the use of the services provided electronically and to improve the functionality of these services.

**Period of storage of personal data:** Data is processed for as long as cookies are stored.

**Purpose of processing:** Cooperation with foreign outlets operating under the name Jacek Lewinson

**Scope of data:** First name, surname, company name, residential address, NIP, REGON

**Legal basis:** Legitimizing premise: Article (6)(1)(b) of GDPR. The basis for the processing of personal data is the need to process personal data for the performance of a contract to which the data subject

is party, or to take steps at the request of the data subject prior to entering into a contract; Article 6(1)(a) of the GDPR i.e. the consent of the data subject to the transfer of personal data

**Period of storage of personal data:** The data is processed until consent is withdrawn, or alternatively until the expiry of contractual claims.

**Purpose of processing:** **Sending Customers' personal data to booksellers to enable them to provide services**

**Scope of data:** First name, surname, company name, residential address, NIP, REGON

**Legal basis:** Legitimizing premise: Article 6(1)(b) of GDPR: the processing is needed for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

**Period of storage of personal data:** Personal data is processed until the service has been provided, or thereafter, i.e. until any claims have expired.

#### 5. **To whom is my personal data transferred?**

The Personal Data Controller takes the utmost care to ensure the confidentiality of your personal data. In order to fulfil contractual obligations and to ensure the proper functioning of the entity operating under the name Jacek Lewinson, personal data is transferred to the persons indicated below.

#### **Service providers, including IT service providers**

We transfer your personal data to the service providers we use to run our business under the name of Jacek Lewinson. The services provided to the Controller ensure the technical, technological and organizational solutions necessary to provide services to Customers and to manage the organization. We also transfer data to, among others, providers of servers on which personal data is stored.

#### **Suppliers of and partners in logistics, transport and delivery services**

We transfer your personal data to suppliers and partners who provide us with logistics, transport and delivery services.

#### **Services provided to the Controller**

We may transfer your data to providers of legal and advisory services (in particular law firms) and other support services provided to the Controller as part of the collection of claims. In addition, we transfer your personal data to entities providing us with audit, financial services, etc.

#### **State authorities**

We make your personal data available if we are requested to do so by authorized state authorities, in particular the organizational units of the Public Prosecutor's Office, the Police, the President of the

Office for Personal Data Protection, the President of the Office for Competition and Consumer Protection or the President of the Office of Electronic Communications.

**6. Is my data transferred outside the European Union?**

We do not transfer your personal data outside the European Union.

**7. Am I obliged to provide data?**

Providing certain personal data is necessary to use the services we offer. Providing other data is voluntary and not necessary for the conclusion and performance of the contract. The information required is either marked as mandatory on the website <http://www.jaceklewinson.com/> or indicated as such by our employee. The consequence of failing to provide this data is that we are unable to provide certain services. Apart from data marked as mandatory, providing other personal data is voluntary.

**8. What are my rights?**

In connection to the processing of your personal data, the Controller ensures that your rights relating to the processing of your personal data, as described below, can be exercised. You can exercise your rights by submitting a request addressed as indicated under point 1.

**Right to withdraw consent**

You have the right to withdraw the consent you have given to the processing of your personal data for marketing purposes (i.e. in connection with sending newsletters), if you have given it. Withdrawal of consent has effect from the moment of withdrawal. The withdrawal of consent does not affect processing carried out by us lawfully before the withdrawal. Withdrawal of consent does not entail any negative consequences for you. However, it will result in us no longer being able to send you newsletters.

**Right to object to data processing**

You have the right to object at any time to the use of your personal data where we are processing your data on the basis of our legitimate interests, e.g. in connection with keeping statistics on the use of particular website functionalities <http://www.jaceklewinson.com/>

If your objection proves to be valid and we have no other legal basis for processing your personal data, we will delete your data for the use to which you have objected.

**Right to erasure ("right to be forgotten")**

You have the right to request the deletion of all or some of your personal data. You have the right to request the deletion of your personal data if:

- a) you have withdrawn specific consent, to the extent that personal data was processed based on your consent;

- b) your personal data is no longer necessary for the purposes for which it was collected or for which it was processed;
- c) you have objected to the use of your data for the purpose of keeping statistics on the use of the Website and satisfaction surveys, and your objection was found to be valid;
- (d) your personal data is being processed unlawfully.

Despite your request to delete your personal data, we may retain certain personal data to the extent that it is needed to establish, pursue or defend claims. This applies in particular to personal data such as your name, surname and e-mail address, which we retain for dealing with complaints and claims relating to the use of our services.

#### **Right to restriction of processing**

You have the right to demand restricting the processing of your personal data. If you make such a request, we will prevent you from using certain functionalities or services, the use of which will involve the processing of the data covered by the request, until the request is processed. You have the right to request that the use of your personal data be restricted in the following cases:

- a) when you challenge the accuracy of your personal data, in which case we will restrict the use of your personal data for the time we need to check the accuracy of your data, but for no longer than seven days;
- b) when the processing of your data is unlawful and you request restriction of use instead of erasure;
- c) when your personal data is no longer needed for the purposes for which we collected or used it, but is needed by you to establish, assert or defend your claims;
- d) where you have objected to the use of your data, in which case the restriction shall be for the time necessary to consider whether, in view of your particular situation, the protection of your interests, rights and freedoms outweighs the interests we pursue by processing your personal data.

#### **Right to access**

You have the right to obtain confirmation from us whether we are processing your personal data and, if this is the case, you have the right to:

- a) gain access to your personal data,
- b) be informed about the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients of that data, the intended period of storage of your data or the criteria for determining that period, your rights under GDPR and your right to lodge a complaint with a supervisory authority, the source of that data, automated decision-making,

including profiling, and the safeguards applied in connection with the transfer of that data outside the European Union,

- c) obtain a copy of your personal data.

#### **Right to rectification of the data**

You have the right to rectify and complete the personal data you have provided. You can do this yourself under Settings (Privacy). With regard to other personal data, you have the right to request that we rectify this data (if it is incorrect) and to complete it (if it is incomplete).

#### **Right to move the data**

You have the right to receive the personal data that you provided to us and then send it to another personal data controller of your choice, such as another operator of similar services. You also have the right to request that we send your personal data directly to such other controller, insofar as this is technically possible.

#### **9. How long does it take us to comply with your request?**

If, in the exercise of the aforementioned rights, you make a request to us, we shall either comply with the request or refuse to comply with it immediately, but no later than one month after receipt. However, if – due to the complexity of the request or the number of requests – we are unable to comply with your request within one month, we will comply with it within two more months and will inform you in advance of the intended extension.

#### **10. Cookies**

We use cookies and other similar mechanisms to make it easier for customers to use the <http://www.jaceklewinson.com/> website, to know how they interact with us and, in some cases, to show them advertising tailored to their internet usage habits. Please read our Cookies Policy to learn more about cookies and similar mechanisms we use, their purpose and other important information.

#### **11. Personal Data Protection Officer**

JACEK LEWINSON is required to appoint a Data Protection Officer.

### **The Cookies Policy**

By using the website provided under the domain of <http://www.jaceklewinson.com/> you consent to the installation of cookies on the terminal equipment of the Website user and to the use of cookies by Jacek Lewinson, in accordance with this Policy. Consent is given via your browser settings. If you do not agree to the use of cookies, you should change the settings of your browser as appropriate, or opt out of using the Website (see below for more information).



The data collected is used to monitor and review how users use our sites in order to improve the website by providing a more efficient and seamless navigation experience.

We monitor user information using the Google Analytics tool, which records user behaviour on the website.

#### **1. What is a cookie?**

“Cookies” are individual, small text files sent by the websites you visit and downloaded onto your computer. The information contained in these files can only be read by the website that created them. Therefore, the website cannot access other files on the user’s computer.

#### **2. For what purpose does the website <http://www.jaceklewinson.com/> use cookies?**

Cookies used on the website <http://www.jaceklewinson.com/> make it possible to measure user activity on the website. We use cookies to customize and improve the way the website works. Cookies also make it possible to examine user preferences and thus continuously improve the quality of our services. We do not use cookies to contact users by telephone, email or post. We do not use behavioural cookies on our websites.

#### **3. What cookies do we use?**

At <http://www.jaceklewinson.com/> two types of cookies may be used:

- a) session cookies – these remain on the user’s device until the user leaves the website or the browser is closed;
- b) permanent cookies – these remain on the user’s device for the time specified in the file parameters or until they are manually deleted by the user;
- c) “essential” cookies to enable the user to use the services available on the website, e.g. authentication cookies used for services that require authentication within the website;
- d) “performance” cookies, enabling the collection of information about the use of the website’s pages;
- e) “functional” cookies, which enable “remembering” the user’s selected settings and personalizing the user interface, e.g. with regard to the selected language or region of origin of the user, font size, appearance of the website, etc.

#### **4. Can I opt out of accepting cookies?**

The storage and sending of cookies is handled by web browsers and is invisible to the user. Most browsers in use accept them by default. However, the user can set the browser to refuse requests to store cookies in general or selected ones. This can be done via the settings in the browser. Before making such a decision, however, it is worth remembering that many cookies help you to use the website.

## 5. How to disable cookies?

Detailed information on the handling of cookies is available in the settings and documentation of the selected web browser.

## ***NEWSLETTER/TIBS***

How to give your consent to receive the Newsletter/TIBS

The service is available free of charge to all Internet users. The registration form, which is also an order to receive the Newsletter/TIBS, is available on the home page of the <http://www.jaceklewinson.com/newsletter> and/or the User may unsubscribe from the Newsletter/TIBS at any time by clicking on the "I RESIGN" hyperlink included in any email sent to the User with the Newsletter content. By placing an order to receive the Newsletter/TIBS, the Customer agrees to receive information contained therein, also if it is of a commercial nature.

### **GDPR Article 13 Information to be provided where personal data is collected from the data subject Information on the Personal Data Controller:**

Firm's name and address:

JACEK LEWINSON

ul. Nowogrodzka 18/20

00-511 Warsaw

NIP (Tax ID No.): 5261369089

REGON (Statistical ID No.): 015201913

NACE: 73.20.Z Market research and public opinion polling the FIRM has been operating since:  
12/07/2002 [www.iaceklewinson.com](http://www.iaceklewinson.com)

JACEK LEWINSON represents a group of leading academic publishers and provides information consulting, promotion and sales services to educational institutions, professional associations, libraries, booksellers, and companies in Central and Eastern Europe (CEE). The business focuses on printed books, e-books, magazines, databases and other digital products.

### **Scope of personal data of Newsletter/TIBS Subscribers:**

1. Name and surname
2. E-mail
3. Organization

4. Position
5. Country/postal address/telephone
6. Thematic scope of interests

#### **Jacek Lewinson**

The aforementioned data is stored by JACEK LEWINSON as follows: in a dedicated IT system, accessible online, secured with particular care. Access to the data is protected by a password. The data is stored on a server that has the latest anti-virus software installed. Backup copies are created regularly.

The provision of personal data by the Subscriber is a contractual requirement. It is understood that only an adult can be a Subscriber.

Personal data has been and is obtained exclusively from the data subject, i.e. the Subscriber.

JACEK LEWINSON will not process special categories of the Subscriber's personal data. We assign fields/topics to each email address, so we do profiling. Personal data processed by JACEK LEWINSON is subject to profiling.

#### **Purpose of processing personal data of Newsletter/TIBS Subscribers:**

Operating the Newsletter/TIBS service – an electronic form of the publisher's newsletter distributed by email to Subscribers.

#### **Legal basis for processing Subscribers' personal data**

GDPR Article 6(1)(a) of GDPR "Processing shall be lawful only if and to the extent that the data subject has given consent to the processing of his or her personal data for one or more specific purposes"

#### **About direct marketing**

The main purpose pursued by Jack Lewinson is the direct marketing of third-party products and services – in this case, a Newsletter subscriber's consent is required to the processing of personal data for the purpose of:

- 1) sending commercial information by means of electronic communication, e.g. advertisements by e-mail, newsletter, etc.;
- 2) using telecommunication terminal equipment for direct marketing purposes, e.g. sending text messages with advertising content.

#### **Legal basis:**

- 1) *Articles 6, 12 and 13 of the GDPR*
- 2) *Article 10 of the Act on electronic provision of services*
- 3) *Article 172 of the Telecommunication Law*

**Information on the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organizations**

Jacek Lewinson has no plans to transfer personal data to recipients in third countries. If the situation changes, the newsletter subscriber will be notified as soon as possible.

**Period of storage of personal data and, where this is not possible, the criteria for determining that period**

Personal data is stored until the newsletter/TIBS subscriber withdraws consent to its processing.

Jacek Lewinson informs the newsletter subscriber of the right to lodge a complaint with a supervisory authority – i.e. the Office for Personal Data Protection with its registered office in Warsaw.

Jacek Lewinson provides the newsletter subscriber with a copy of the personal data being processed.

Subscribers have the right to request that the controller give them access to their personal data, rectification, erasure or restriction of processing or the right to object to processing, as well as the right to data portability.

**GDPR Article 16 Right of rectification**

The subscriber has the right to request that the controller immediately rectify inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the subscriber has the right to request the completion of incomplete personal data, including by providing an additional declaration.

**GDPR Article 17 Right to erasure (“right to be forgotten”)**

The subscriber has the right to request that the controller immediately erase personal data concerning him/her, and the controller is obliged to delete the personal data without undue delay if the circumstances so permit. Having analysed the situation, the controller will inform the subscriber about the erasure of his/her personal data.

**GDPR Article 18 Right to restriction of processing**

The subscriber has the right to request that the controller restrict processing in the following cases:

- a) when the subscriber questions the accuracy of personal data;
- b) when the processing is unlawful and the data subject objects to the erasure of the personal

data, requesting instead the restriction of its use;

- c) when the controller no longer needs the personal data for processing purposes, but it is needed by the subscriber to establish, assert or defend a claim;
- d) when the subscriber has objected to the processing – until it is determined whether the legitimate grounds on the part of the controller override the grounds of the data subject's objection.

### **GDPR Article 21 Right to objection**

The subscriber has the right to object at any time – on grounds relating to his or her particular situation – to the processing of personal data concerning him or her for direct marketing purposes.

Jacek Lewinson will not further process the personal data unless he demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, assertion or defence of claims.

The subscriber can exercise the right of objection through automated means using technical specifications.

### **Withdrawal of "consent" by newsletter/TIBS subscriber**

Before the option to give consent is made available to the subscriber on the web form, a message appears on the subscriber's computer screen informing the subscriber that he or she can easily withdraw the consent given.

GDPR legal basis:

### **Article 7(3) of GDPR Conditions for consent**

The data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent."

### **Granting of "consent" by the newsletter subscriber**

"Consent" of the subscriber to whom the data refers means a voluntary, specific, informed and unequivocal demonstration of intent, in the form of a clear affirmative action consisting of the insertion of a sign indicating consent in the space indicated for this on Jacek Lewinson's web form. The consent given enables the processing of the Subscriber's personal data.

Jacek Lewinson is required to keep a register of processing activities.

Jacek Lewinson provides electronic information to subscribers at the e-mail address provided by the subscriber. If the subscriber requests the information orally, this will be possible after providing

additional information allowing identification.

We reserve the right to process the subscriber's data after termination of the Agreement or withdrawal of consent only to the extent necessary for the assertion of potential claims in court or if national or EU regulations or international law oblige us to retain the data.

We have the right to share subscriber data with authorized parties based solely on the relevant legal provisions.

Erasure of personal data may take place as a result of the withdrawal of consent or the lodging of a legally permissible objection to the processing of personal data.

Sending the Newsletter to the Subscriber requires the Subscriber's consent.

## JACEK LEWINSON

### Subscribers' personal data:

- 1 Name and surname
- 2 E-mail
- 3 Organization
- 4 Job title
- 5 Country
- 6 List of books planned to be published
- 7 List of the publisher's old books
- 8 Topic of the book to be published

**WE INVITE SUBSCRIBERS TO USE INFORMATION IN THE NEWSLETTER. We will only process personal data with the consent of the SUBSCRIBER.**

## JACEK LEWINSON

IN OUR FIRM, WE ENSURE THAT SUBSCRIBERS' PERSONAL DATA:

- IS INVISIBLE TO UNAUTHORIZED PERSONS;
- IS PROCESSED IN ACCORDANCE WITH THE APPLICABLE LAW;

- IS AVAILABLE TO AUTHORIZED ENTITIES;
- IS PROPERLY PROTECTED AND SECURED;
- IS EASILY REMOVABLE, UPDATED.

We ensure that appropriate technical and organizational measures are taken to guarantee that the processing of personal data is carried out in a way that protects the data. As technology develops, laws are updated and the FIRM's needs change, the measures listed are reviewed and updated.