

PRIVACY POLICY

The joint data controllers of the website are:

- Rojam sp. z o.o., with its registered office in Gdynia, ul. Sanocka 14, 81-507 Gdynia, entered in the Register of Entrepreneurs under KRS number: 0000399548, NIP: 5862274465
- Rojam Safety Center sp. z o.o., with its registered office in Gdynia, ul. Sanocka 14, 81-507 Gdynia, entered in the Register of Entrepreneurs under KRS number: 0000824877, NIP: 5862352811

hereinafter collectively referred to as: **Rojam**.

You can contact us via email at: biuro@rojam.eu or by sending a traditional letter to the address of Rojam.

In this Privacy Policy, you will learn how your data is collected and used when you visit the website sklep.rojam.eu.

Our goal is to properly inform you about issues related to the processing of personal data in accordance with 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).

How, on what legal basis, and what types of personal data do we process?

Use of the Website

We process data of all individuals using the website (including IP addresses or other identifiers). These data are processed for the purpose of providing electronic services related to the availability of content posted on the website (Article 6(1)(b) of the GDPR).

Use of an Account

The purpose of data processing may be the provision of free electronic services, i.e. the creation and management of a user account on the website. The data collected from individuals registering an account include the information necessary for registration, such as name and surname, business-related data, and contact details (address, email address, phone number).

The legal basis for processing this data is the necessity for the performance of a contract for the provision of free electronic services or to take steps prior to entering into such a contract (Article 6(1)(b) of the GDPR).

Contacting Rojam

If you contact us, whether by email or through the contact form, we process the data you provide during the communication. Providing such data is voluntary but necessary to engage in communication with you.

We process this data to respond to your message and to maintain further contact related to your inquiry. The legal basis for this processing is our legitimate interest (Article 6(1)(f) of the GDPR) or taking steps prior to entering into a contract (Article 6(1)(b) of the GDPR).

Commercial Information – Marketing Consent

We will process your data for marketing purposes only with your explicit consent. Personal data processed for the purpose of receiving commercial and marketing information may include your name, surname, email address or phone number, and information related to your business activity.

The legal basis for processing this data is your consent (Article 6(1)(a) of the GDPR). This consent may be withdrawn at any time.

Newsletter

If available on the website, you may subscribe to our newsletter. Personal data provided for this purpose may include your name, surname, email address or phone number, and business-related information.

The legal basis for processing this data is your consent (Article 6(1)(a) of the GDPR). This consent may be withdrawn at any time.

Links to Other Websites

The website may contain links to other websites. If you click on a third-party link, you will be redirected to that site. Please note that these external websites are not operated by us. Therefore, we strongly advise you to review the privacy policies of those websites.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Social Media Plugins, Widgets, and Tools

The website uses plugins, widgets, and other social media tools provided by platforms such as Facebook (Meta). The rules for personal data processing are described directly on the websites of these providers.

More information can be found at the following link – Facebook: <https://www.facebook.com/policy.php>

Details regarding the scope and purpose of data collection, its further processing and use by social media platforms, as well as your rights and privacy settings options, are available directly on the respective platforms.

If you do not want a social media platform to link data collected during your visit to our website directly to your profile, please log out of that platform before visiting our website.

The legal basis for processing data in this context is our legitimate interest (Article 6(1)(f) of the GDPR).

Website Optimization

We may process data such as statistical information about user behavior, for example, tracking navigation on the website or the amount of time spent on a specific section.

We analyze this data to optimize the website. In most cases, the information processed in this manner does not constitute personal data. Exceptionally, if the website includes features such as account registration, this information may be matched to your registered account data.

The legal basis for processing data for this purpose is our legitimate interest (Article 6(1)(f) of the GDPR).

Pursuing Claims

We may also process personal data for the purpose of establishing, pursuing, or defending against legal claims.

The legal basis for such processing is Rojam's legitimate interest (Article 6(1)(f) of the GDPR), namely the protection of its rights.

Automated Decision-Making and Profiling

Personal data will not be processed in a manner that involves automated decision-making which could affect you in any significant way.

Personal data may be subject to profiling solely for the purpose of tailoring content and personalizing offers, and only upon obtaining your consent.

Cookies

Virtually every website today uses so-called cookies – small text files used to automatically collect data from website users. Our website is no exception. The information obtained this way is stored on the user's device.

There are two primary purposes for using cookies: to maintain and save the user's session and to ensure website security (e.g. for detecting abuse). In this context, the use of cookies is essential.

Rojam uses necessary cookies to ensure the proper functioning of the website. The legal basis for processing data related to the use of necessary cookies is the necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR).

In addition to necessary cookies, we may also use cookies that are not strictly essential but significantly improve the user experience. These cookies may be used for purposes such as:

- remembering user preferences regarding the display of specific messages or limiting how many times a message is shown,
- monitoring user activity on the website,
- collecting anonymous, aggregated statistics to improve website functionality.

We use analytical cookies. The legal basis for the processing of personal data in connection with the use of analytical cookies is our legitimate interest and your consent (Article 6(1)(a) and (f) of the GDPR), consisting of ensuring the highest quality of website performance.

Additionally, we use both our own and third-party cookies (from external service providers such as Meta, Google Ads) for marketing purposes. These allow us to reach you with marketing messages on our own website, our partners' websites, and those of external providers. The legal basis for processing personal data in this context is also our legitimate interest and your consent (Article 6(1)(a) and (f) of the GDPR), aimed at optimizing marketing communication and website functionality.

We work with external service providers for these purposes, and the list of such entities may change over time depending on market developments and technical capabilities.

Please note that you are not required to accept cookies (except for technically necessary cookies). You can configure your web browser to block cookies from being stored on your device. It is also possible to delete existing cookies.

However, not accepting cookies may negatively affect website performance, and in some cases, may prevent the use of certain features.

If you would like to learn how to manage cookies, including how to disable them in your browser, please consult your browser's help section. In most browsers, you can access help by pressing the F1 key. You can also refer to the relevant support pages for specific browsers:

- Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>

How Long Do We Store Your Data?

The data retention period depends on the legal basis for processing:

- if the data is processed based on consent (e.g., to send marketing communications), the data is stored until consent is withdrawn,
- if the data is processed for the performance of a contract – for the duration of the contract and until claims under the contract become time-barred,
- if processing is based on legal obligations – for as long as required by the applicable legal provisions,
- if the data is processed based on legitimate interest – for as long as the legitimate interest exists.

The retention period may be extended if data processing is necessary for the establishment, exercise, or defense of legal claims. After the expiration of the above periods, the data is promptly deleted or anonymized.

Data Recipients

We may share user data when necessary for the performance of services, to fulfill legal obligations, or to comply with applicable legal requirements.

We work with external service providers who support us with accounting, legal, marketing, or IT services. If necessary, personal data may also be provided to competent authorities.

Data Transfers Outside the EEA (European Economic Area)

Some of our service providers may be located outside the European Economic Area (EEA), particularly in the United States.

When transferring data outside the EEA, we exercise particular caution. We ensure that providers guarantee a high level of personal data protection in line with applicable EEA requirements.

When transferring personal data to entities in the United States, we verify whether the provider participates in the EU-U.S. Data Privacy Framework and is included in the list of certified organizations maintained by the U.S. Department of Commerce.

Your Rights Under the GDPR

In accordance with Articles 12–21 of the GDPR, you have the following rights regarding your personal data:

- right to information about how your data is processed (Articles 12 and 13 GDPR),
- right of access to your personal data (Article 15 GDPR),
- right to rectification of inaccurate or incomplete personal data (Article 16 GDPR),
- right to restriction of processing (Article 18 GDPR),
- right to data portability to another data controller (Article 20 GDPR),
- right to object to processing based on legitimate interest due to your particular situation (Article 21(1) GDPR) – this right is not absolute; we may continue processing if we can demonstrate compelling legitimate grounds or the necessity to establish, exercise, or defend legal claims,
- right to object to processing for direct marketing purposes – if applicable, we will no longer process your data for this purpose,
- right to erasure ("right to be forgotten", Article 17 GDPR) – this right applies, for example, if the data is processed unlawfully, if you object to processing for marketing purposes, or if data must be erased to comply with legal obligations,
- right to lodge a complaint with the supervisory authority – in Poland, this is the President of the Personal Data Protection Office (PUODO).

Data Protection Measures

We apply all available physical, technical, and organizational measures to ensure the security of personal data. In particular, we safeguard the data against destruction, accidental loss, unauthorized access, alteration, or disclosure. Access to data is reviewed and restricted where appropriate.

Updates to the Privacy Policy

This Privacy Policy will be updated as necessary, especially in the event of new legal requirements or regulatory guidance.

We will also update it in line with technological developments related to data processing and protection, changes in processing purposes, types of data collected, or legal bases for processing.