



# Privacy Policy of the XTrack.com Website

Effective from 22 October 2026.

## Introduction

This document is the privacy policy of the XTrack website, hereinafter referred to as the Website, available at [xtrack.com](https://xtrack.com).

Respecting the rights and freedoms of the persons whose data we process, and fulfilling the obligation arising from 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 (hereinafter: the GDPR), we inform you that:

## Who is the controller of your personal data

The controller of personal data and the operator of the Website is XTrack Sp. z o.o., with its registered office in Gdańsk, ul. Piastowska 63a, 80-363 Gdańsk, entered in the Register of Entrepreneurs of the National Court Register by the District Court Gdańsk-Północ in Gdańsk, KRS no.: 0000205744, NIP (tax identification number): 5840358083, share capital: PLN 100,000, hereinafter referred to as the "Controller".

## How to contact the Controller on matters concerning the processing of personal data

The Controller has designated a **contact point**, which is operated by the Data Protection Officer. On matters concerning the protection of personal data, you can contact the Controller:

- by e-mail at: [gdpr@xtrack.com](mailto:gdpr@xtrack.com)
- by post – by sending enquiries to the Controller's address (XTrack sp. z o.o., ul. Piastowska 63a, 80-363 Gdańsk) marked "Data Protection Officer"

## For what purpose, for how long, and whose personal data we process

| Purpose                                                                                                                            | Whose data we process for this purpose                    | Legal basis       | Processing period                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Responding to an enquiry sent via the contact form on the website or the chat, or sent directly to the Controller's e-mail address | Data of persons who sent an enquiry via the contact form. | Art. 6(1)(f) GDPR | For the duration of the correspondence – until the last reply is given (in the case of offer enquiries). For enquiries and instructions, see below. |

| Purpose                                                                                                                                                             | Whose data we process for this purpose                                                                                                 | Legal basis                            | Processing period                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| Responding to enquiries and instructions                                                                                                                            | Data of persons who sent instructions or an enquiry.                                                                                   | Art. 6(1)(b) GDPR                      | For the duration of the contract, in order to perform its subject matter.                                                                          |
|                                                                                                                                                                     |                                                                                                                                        | Art. 6(1)(f) GDPR                      | For the duration of the contract, in order to perform its subject matter, and for the period resulting from the limitation of any claims.          |
| Marketing activities on the website                                                                                                                                 | Data of website users who have consented to the installation of cookies.                                                               | Art. 6(1)(a) GDPR                      | At most until the cookie is removed from the User's device, but no longer than 14 months.                                                          |
| Responding to complaints                                                                                                                                            | Data of persons who sent instructions or an enquiry.                                                                                   | Art. 6(1)(f) GDPR                      | For the duration of the contract, in order to perform its subject matter, and for the period resulting from the limitation of any claims.          |
| Sending the newsletter and marketing activities                                                                                                                     | Data of persons who subscribed to the newsletter or completed a marketing form.                                                        | Art. 6(1)(a) Consent given by the User | Until consent is withdrawn.                                                                                                                        |
| Preparation and performance of a contract.                                                                                                                          | Representative, Parties to the contract                                                                                                | Art. 6(1)(b) GDPR                      | For the term of the contract.                                                                                                                      |
| Contact in matters related to a contract concluded with an entity of which you are a representative or on whose behalf you act on the basis of a power of attorney. | Representative of a Party to the contract, Proxy of a Party to the contract                                                            | Art. 6(1)(f) GDPR                      | For the term of the contract.                                                                                                                      |
| Establishing, pursuing and defending against claims.                                                                                                                | Representative, Representative of a Party to the contract, Proxy of a Party to the contract                                            | Art. 6(1)(f) GDPR                      | Until the expiry of the limitation period for claims, as specified in Polish law.                                                                  |
| Direct marketing of own products.                                                                                                                                   | Representative, Representative of a Party to the contract, Customer                                                                    | Art. 6(1)(f) GDPR                      | Until the contract expires or the person objects.                                                                                                  |
| Handling complaints and requests.                                                                                                                                   | Persons taking part in the complaint procedure, including persons submitting requests concerning the processing of their personal data | Art. 6(1)(f) GDPR                      | 3 years from the last effective reply, or until the warranty expires, if its term is extended as a result of a complaint that has been considered. |
| Conducting business negotiations or considering offers.                                                                                                             | Potential customers, potential subcontractors                                                                                          | Art. 6(1)(f) GDPR                      | Until the negotiation process ends or until the person objects.                                                                                    |

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## Who may have access to personal data

Personal data may be disclosed to public authorities to the extent and for the purposes arising from generally applicable law, as well as to entities that process personal data on the basis of relevant agreements signed with the Controller:

- hosting service providers, including e-mail providers,
- accounting and debt collection entities,
- providers of marketing systems and services,
- providers supporting the operation of websites, e.g. sending e-mail notifications and/or newsletters.

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## Does the Controller transfer personal data to third countries

We transfer to third countries information collected by cookies provided by Google LLC, which are installed on your device after you give your consent.

To any other extent, personal data is not transferred outside the European Economic Area.

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## What rights a person whose personal data we process may exercise

At any time you may request us to exercise your right to:

1. access your data to the extent specified by the GDPR (Art. 15 GDPR),
2. have your data rectified (Art. 16 GDPR),
3. request erasure of your data where one of the grounds specified by the GDPR is met (Art. 17 GDPR),
4. request restriction of processing in cases specified by the GDPR (Art. 18 GDPR),
5. have your data transferred (Art. 20 GDPR),
6. lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office (Art. 77 GDPR),
7. object, where data is processed for the legitimate purposes pursued by the Controller (Art. 21 GDPR).

In addition, if we process your personal data on the basis of consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of the processing of personal data carried out before its withdrawal.

You can exercise your rights by contacting our Data Protection Officer at [gdpr@xtrack.com](mailto:gdpr@xtrack.com) or by sending a request by post. You will find the details in the section “How to contact the Controller on matters concerning the processing of personal data”.

## COOKIES POLICY

The controller of the cookies installed on the User's device during a visit to the website is XTrack Sp. z o.o., with its registered office in Gdańsk, ul. Piastowska 63a, 80-363 Gdańsk, entered in the Register of Entrepreneurs of the National Court Register by the District Court Gdańsk-Północ in Gdańsk, KRS no.: 0000205744, NIP (tax identification number): 5840358083, share capital: PLN 100,000, hereinafter referred to as the "Controller".

### What are cookies and what are they used for?

Cookies are text files sent by a web server and stored by the web browser in the memory of the device on which the website was displayed. Thanks to cookies, websites know that the User is logged in and remember settings and, in the case of third-party cookies, collect information about the User's activity in the browser, which allows them to tailor advertising messages and other content (e.g. information) displayed to the User on various websites.

Our website uses cookies to make browsing the Website easier, to prepare traffic statistics for the Website, to remember the User's settings (font, size, language) and to enable integration with social media platforms (direct navigation from the Website to our pages on social media).

### Necessary cookies

If your browser settings allow cookies to be installed on the device you are using, then when you visit our website the cookies necessary for the operation of our website will be installed. By contrast, our own and third-party (other companies') marketing cookies will be installed only when you give your consent.

We install necessary cookies on the basis of a legitimate interest, which is the optimisation of the operation of the website. If you do not agree to the installation of such cookies, you can object by configuring your browser so as to block the installation of cookies in the device's memory.

### Marketing cookies.

Marketing cookies are used to analyse the behaviour of users visiting websites in order to display advertisements and content tailored to their profile, and thus more valuable to publishers and external advertisers. Such cookies may be installed only with your consent, given by ticking the consent in the pop-up when you enter our website or by closing the pop-up window.

The cookies we currently use and their description can be found in our cookie pop-up after you enter the website or by clicking the Cookiebot icon in the bottom left corner.

### Changing browser settings – deleting cookies or opting out of their installation.

You can change or delete cookies at any time by making the appropriate changes in your browser settings. Details can be found on the software manufacturers' websites.

Below we provide links to information for the most popular browsers:

- Microsoft Edge - <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy>

- Chrome - <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox - <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Opera - <https://help.opera.com/en/latest/security-and-privacy/>
- Safari - <https://support.apple.com/en-us/HT201265>