

Privacy Policy

This Privacy Policy sets out the rules for storing and accessing data contained in Cookie files on the devices of Users using the Service, as well as processing personal data for the purposes of providing services, as indicated in the Privacy Policy by the Administrator.

§1 Definitions

1. Administrator, SUNTECH – SUNTECH S.A. with its registered office in Warsaw, at 107 Puławska Str, entered in the Register of Businesses maintained by the District Court for the City of Warsaw, 20th Commercial Division of the National Court Register under KRS number: 0000303450; NIP [Taxpayer Reference Number]: 113-01-16-894
2. You can contact us:
 - a) by post, using the postal address given above;
 - b) using our website contact form;
 - c) by telephone, on the contact number published on our website; or
 - d) by email: info@suntech.pl
3. Cookies, Cookie Files – text data collected in the form of files placed on the User's Device;
4. Account – a set of resources and settings created for the User within the Service, used to manage the Services;
5. Policy – this Privacy Policy;
6. Regulations – Regulations for the provision of electronic services in the Service;
7. GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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);
8. Session – the period of use (entry) by the User of the Service;
9. Service – SUNTECH's website <https://coe.sunvizion.com/>;
10. External Services – internet services of partners, service providers, or service recipients of the Administrator;
11. Device – electronic device with software through which the User accesses the Service;
12. Services – services provided by SUNTECH;
13. Act on the provision of electronic services – the Act of 18 July 2002 on the provision of electronic services (consolidated text: Journal of Laws of 2020, item 344));
14. User – any individual visiting the Service or using one or more Services or functionalities of the Service.

§2 General Provisions

1. SUNTECH is the owner of the Service.
2. In order to use the Service and provide Services, SUNTECH collects and processes User data.

3. SUNTECH, in accordance with the GDPR is the data controller for personal data processed within the Service, in the performance of services by SUNTECH, and in contact with the User.
4. The Policy defines the principles of processing personal data and data contained in Cookies on Devices for the purposes specified in the Policy.

§3 Purposes and Legal Bases for Processing Data by SUNTECH

1. In connection with the operation of the Service, the following User data is collected:

- 1.1 Data collected automatically using Cookies.

During the user's visit to the Service's website, data is automatically collected, including identifying markings (login or other assigned by the operator), IP address, browser name, operating system, information about the start, end, and scope of each use of the Service, and the available services within it. The data collected automatically using Cookies is not associated by SUNTECH with personal data such as name, email address, phone number, and other data enabling easy identification of the User.

- 1.2 The data provided by Users for the purpose of sharing information about products.

In the Service, through various functionalities of the Service, the User may contact SUNTECH, simultaneously providing their contact details for the purpose of sharing information about products (in particular: 'Contact') The legal basis for processing personal data in this respect is:

- 1.2.1 the conclusion and performance of a contract for the provision of e-learning product services (Article 6(1)(b) GDPR),
 - 1.2.2 and in the case where the person whose data is concerned acts on behalf of a party to the contract – establishing and maintaining business cooperation – processing personal data for this purpose is based on the legitimate interest pursued by SUNTECH (Article 6(1)(f) GDPR), which is the ability to conduct business activities by SUNTECH,
 - 1.2.3 and in the case of data provided voluntarily, the legal basis for processing is the User's consent (Article 6(1)(a) GDPR),
 - 1.2.4 the pursuit of the legitimate interest of SUNTECH in order to establish, assert, or defend legal claims (Article 6(1)(f) GDPR).

- 1.3 User's Data for SUNTECH's Marketing Purposes.

User's data are processed for SUNTECH's marketing purposes and for the purpose of transmitting commercial information using means of distance communication (phone, SMS, email), provided that the User has given consent, including within the framework of the obligations of the Parties under the Demo agreement. The User is entitled to withdraw the given consent at any time by sending information to the contact details specified in the information clauses or the Privacy Policy.

The legal basis for processing personal data in this scope is the User's consent, including within the framework of entering into a demo agreement (Article 6(1)(a) of the GDPR, Article 10(2) of the Act of

July 18, 2002, on the provision of electronic services, and Article 172(1) of the Act of July 16, 2004, Telecommunications Law).

2. Users, in connection with the processing of personal data by SUNTECH, have the following rights:
 - 2.1 the right to access their personal data;
 - 2.2 the right to correct their personal data;
 - 2.3 the right to delete their personal data;
 - 2.4 the right to limit the processing of their personal data;
 - 2.5 the right to transfer their personal data;
 - 2.6 the right to object to the processing of personal data when processing is based on SUNTECH's legitimate interest;
 - 2.7 the right to lodge a complaint with the supervisory authority;
 - 2.8 the right to withdraw consent to the processing of personal data at any time in a voluntary manner.

§4 Consent to the Use of Cookies in the Service

1. During the user's first session on the website, they have the right to choose the cookies used on the website. The user can give consent to all cookies or choose according to their preferences.
2. The user can, at any time, independently change the settings related to the storage, deletion, and access to data saved in cookies. The user can also completely block the use of cookies. At any time, the user can delete all cookies saved up to that point. Making the changes mentioned above may result in the loss of the ability to use some functionalities in the Service.
3. Information on disabling cookies in the most popular computer and mobile device browsers is available on the following pages:
 - i. Cookies in Internet Explorer;
 - ii. Cookies in Chrome;
 - iii. Cookies in Firefox;
 - iv. Cookies in Opera;
 - v. Cookies in Safari;
4. Failure to make a choice as mentioned in paragraph 1 above and changes as mentioned in paragraph 2 above means that cookies will be placed on the user's device according to the user's settings, and thus SUNTECH will store information on the device and access that information.
5. SUNTECH is not responsible for the malfunctioning of website features if the user restricts in any way the ability to save and read cookies.

§5 External Services

1. The Service may contain links to websites that are not operated by SUNTECH. We strongly advise users to review the privacy policies and terms of use of these linked websites before engaging with them. SUNTECH assumes no responsibility for the content, practices, or policies of these external websites unless explicitly stated otherwise.
2. In connection with the use of the "Learning Assistant Chat" provided in this Service, Users acknowledge and agree that any content created, transmitted, or stored within the tool may be subject to review, monitoring, and analysis by SUNTECH. By using the "Learning Assistant Chat", users consent to such monitoring and waive any expectation of complete confidentiality to content generated within the tool, except as expressly required by applicable privacy laws.

§6 Security

1. The mechanisms for storing and reading Cookies do not allow for the retrieval of any personal data or confidential information from the User's device. The transfer of viruses, trojans, and other malware to the User's device is practically impossible.
2. In the case of internal Cookies – the Cookies implemented by the Administrator are safe for the User's devices.
3. In the case of external Cookies – the Administrator is not responsible for the security of Cookie files originating from Service partners. The list of partners is provided in Section 6, paragraph 2 of the Policy.

§7 Policy Changes

1. SUNTECH reserves the right to make changes to the Policy, especially due to the development of internet technology, possible changes in data protection laws, and the evolution of the Service.
2. SUNTECH will notify about any changes prominently and understandably by placing information about the introduced changes on the page where the Policy is posted.
3. The introduced changes take effect on the day of publishing the Policy changes.
4. In case of any doubts regarding any provision of the Policy, please contact SUNTECH.