

# Autopay System Privacy Policy

Date of update: 4 March 2026

## Dear User!

We care about your privacy and want you to feel comfortable when using our services.

Therefore, below we present the most important information about the rules for processing your personal data within the Autopay System (the "System"), which consists of the Autopay mobile application (the "Application") and the website with the Autopay web application, located at <https://autopay.pl/> (the "Website"). This document also provides information about the cookies used by the Website.

This information has been prepared in accordance with the GDPR, i.e. the General Data Protection Regulation.

## PERSONAL DATA CONTROLLER

Autopay Mobility spółka z ograniczoną  
odpowiedzialnością  
ul. Powstańców Warszawy 6  
81-718 Sopot

entered in the Register of Entrepreneurs of the National Court Register by the District Court Gdańsk - Północ, 8th Commercial Division of the National Court Register under number 0000794787, with Tax Identification Number (NIP): 5272898696, REGON: 383879060, with share capital of PLN 19,296,959.00.

If you wish to contact us in connection with our processing of your personal data, you can send a message to our data protection officer, Mateusz Budrewicz, at the following e-mail address: [dpo@autopay.pl](mailto:dpo@autopay.pl).

## YOUR RIGHTS

We process your data for purposes related to the functioning of the System and the provision of services offered therein. With regard to the processing, you have the right to request:

- access to your personal data, including obtaining a copy of your data (Article 15 of the GDPR or, if applicable, Article 13(1)(f) of the GDPR),
- rectification (Article 16 of the GDPR),
- erasure (Article 17 of the GDPR),

- restriction of processing (Article 18 of the GDPR),
- request the transfer of data to another controller (Article 20 of the GDPR).

You also have the right to:

- object at any time to the processing of your data:
  - for reasons related to your particular situation – to the processing of personal data concerning you, based on Article 6(1)(f) of the GDPR (i.e. on our legitimate interests), including profiling (Article 21(1) of the GDPR);
  - if personal data is processed for direct marketing purposes, including profiling, to the extent that the processing is related to such direct marketing (Article 21(2) of the GDPR).

Please contact our Data Protection Officer if you wish to exercise your rights.

You can object to our use of cookies (which you can read about below) in particular by using the appropriate browser settings.

In addition, if you wish to delete your account in our System, you can do so via the Application using the function provided for this purpose.

If you believe that your data is being processed unlawfully, you may lodge a complaint with the President of the Personal Data Protection Authority.

## PERSONAL DATA AND PRIVACY

Below you will find detailed information on the processing of your data depending on the actions you take.

### 1. Creating an account and using the services offered on the Website

For what purpose?
To enable you to use the Autopay application features
On what basis?

Service agreement (Article 6(1)(b) (b) of the GDPR)	our legal obligation (related in particular to accounting – if you make payments via the Application), requiring us to process your personal data (Article 6(1)(c) of the GDPR)
<b>How long?</b>	
until the termination of the service agreement	until the legal obligation expires
<p><i>in addition, your data will be processed until the expiry of the period during which claims may be pursued – by you or by us.</i></p> <p><i>(for more information on this subject, see the last table in this section)</i></p>	
<b>What happens if I do not provide my data?</b>	
you will not be able to use the Autopay application	

## 2. Use of the paid SMS message service confirming the purchase of a vignette

<b>For what purpose?</b>	
To send an SMS confirming the vignette order	
<b>On what basis?</b>	
Service agreement (Article 6(1)(b) (b) of the GDPR)	our legal obligation (related in particular to accounting – if you make a payment via the Application), requiring us to process your personal data (Article 6(1)(c) of the GDPR)
<b>How long?</b>	
until the service agreement is fulfilled	until the legal obligation expires
<p><i>In addition, your data will be processed until the expiry of the period during which claims may be pursued – by you or by us.</i></p> <p><i>(for more information on this subject, see the last table in this section)</i></p>	
<b>What happens if I do not provide my data?</b>	
Information about the completion of your vignette order will only be sent to the email address you provide	

## 3. Contacting us (e.g. to ask a question)

For what purpose?	
To handle your enquiries or requests	
On what basis?	
Contract or actions taken at your request, aimed at concluding a contract (Article 6(1)(b) of the GDPR) – if your enquiry or request concerns a contract to which we are or may be a party to	Our legitimate interest in processing your data for the purpose of communicating with you (Article 6(1)(f) of the GDPR) – if your enquiry or request is not related to a contract
How long?	
For the duration of the contract binding us or, if no contract is concluded, for a period of 36 months in the case of data provided during a telephone conversation	For a period of 36 months in the case of data provided during a telephone conversation or until we take your objection to the processing *
<p><i>In addition, your data will be processed until the expiry of the period during which claims may be pursued – by you or by us.</i></p> <p><i>(For more information on this, see the last table in this section.)</i></p>	
What happens if I do not provide my data?	
We will not be able to respond to your enquiry or request	

\* depending on which applies in a given case and which occurs first

#### 4. Browser settings (in the case of the Website) or other similar actions allowing marketing activities

For what purpose?
Direct marketing, consisting of displaying personalised advertisements (for more information, see the "Profiling" and "Cookies" sections of the Privacy Policy).
On what basis?
Our legitimate interest in processing data for the above-mentioned purpose (Article 6(1)(f) of the GDPR), in particular in connection with your consent to the use of marketing/advertising cookies and similar technologies
How long?
Until the marketing cookies expire or are deleted by you, or until you object in another way *

### What happens if I do not provide my data?

You will not receive suggestions for products or services that may be of interest to you

\* whichever applies in a given case and whichever occurs first

## 5. Browser settings (in the case of the Website) or other similar actions allowing analytical activities

### For what purpose?

to analyse how you use and navigate the System in order to adapt it to the needs and behaviour of Users (for more information, see the sections "Analytical activities", "Profiling" and "Cookies" of the Privacy Policy )

### On what basis?

Our legitimate interest in processing data for the purpose specified above (Article 6(1)(f) of the GDPR), in particular in connection with your consent to the use of analytical cookies and similar technologies

### How long?

Until the expiry date or until you delete the analytical cookies, or until you object in another way\*

### What happens if I do not provide my data?

We will not take your preferences regarding the use of the System into account

\*whichever applies in a given case and whichever occurs first

## 6. Newsletter subscription

### For what purpose?

To send you our newsletter

### On what basis?

contract for the provision of newsletter delivery services (Article 6(1)(b) of the GDPR)

### How long?

Until you unsubscribe from our newsletter

*In addition, your data will be processed until the expiry of the period during which claims may be pursued – by you or by us.*

*(For more information on this subject, see the last table in this section)*

#### What happens if I do not provide my data?

You will not be able to receive information about the System and our services.

## 7. Your consent to the creation and use of a biometric hand identifier to verify your identity when using some of our services

#### For what purpose?

To create, collect, store and use your biometric handprint to verify your identity when using certain Autopay services.

#### On what basis?

Explicit consent to the creation and use of a biometric hand identifier (Article 9(2)(a) of the GDPR).

#### How long?

Until you withdraw your consent, and if you do not use your account, after 1 year from your last activity.

*In addition, your data will be processed until the expiry of the period during which claims may be pursued – by you or by us.*

*(For more information on this subject, see the last table in this section).*

#### What happens if I do not provide my data?

You will not be able to use the option of verifying your identity using biometrics when shopping using our service, and therefore payments for goods/services will have to be made directly to the seller/service provider (e.g. in cash, by card – depending on the payment method available at the seller/service provider)

## 8. Your consent to receive marketing content from us (e.g. information about special offers)

#### For what purpose?

Sending marketing information, especially special offers

#### On what basis?

Your consent to our marketing activities (Article 6(1)(a) of the GDPR)

#### For how long?

Until you withdraw your consent – remember, you can withdraw your consent at any time. Data processing remains lawful until you withdraw your consent.

*In addition, your data will be processed until the expiry of the period during which claims can be pursued – by you or by us.*

*(For more information on this subject, see the last table in this section).*

What happens if I do not provide my data?

You will not receive our marketing materials, including information about our special offers

## 9. Your consent to the transfer of your personal data to our trusted Partners for the purpose of providing you with marketing content (e.g. information about special offers)

For what purpose?

To accept your consent and transfer it to our Partner

On what basis?

Consent to the processing of data for the above-mentioned purpose  
(Article 6(1)(a) of the GDPR)

For how long?

Until you withdraw your consent – remember, you can withdraw your consent at any time. Data processing remains lawful until you withdraw your consent.

*In addition, your data will be processed until the period during which it is possible to pursue claims – by you or by us – expires.*

*(For more information on this, see the last table in this section.)*

What happens if I do not provide my data?

You will not receive marketing materials from our trusted Partners

## 10. Participation in a satisfaction survey about our services

For what purpose?

To tailor our services to the needs of Users and improve the quality of these services

On what basis?
Our legitimate interest in processing your data for the purpose of conducting surveys of your satisfaction with our services (Article 6(1)(f) of the GDPR)
For how long?
For the duration of the contract or until we accept your objection to processing*
<i>In addition, your data will be processed until the expiry of the period during which claims may be pursued – by you or by us. (for more information on this, see the last table in this section)</i>
What happens if I do not provide my data?
We will not take your opinion on our services into account in our work on their further development

\* whichever applies in a given case and whichever occurs first

## 11. Taking or refraining from taking action that may give rise to claims related to the System

For what purpose?
To establish, pursue or defend any claims related to the System
On what basis?
Our legitimate interest in processing personal data for the purpose indicated above (Article 6(1)(f) of the GDPR)
For how long?
Until the limitation period for claims expires or until we accept your objection to processing *
What happens if I do not provide my data?
It will not be possible to establish, pursue or defend claims

\* depending on which applies in a given case and which occurs first

## 12. Reporting to the National Revenue Administration

For what purpose?
To comply with legal requirements in connection with the operation of the National e-Invoice System and the OSS (One-Stop-Shop) procedure

On what basis?
Our legal obligation (related in particular to accounting and taxation) requiring us to process your personal data and transfer it to the National Revenue Administration (Article 6(1)(c) of the GDPR)
How long?
Until the expiry of the period specified in the generally applicable law (Act of 11 March 2004 on Goods and Services Tax).
What happens if I do not provide my data?
it will not be possible to transfer it to the National Revenue Administration as the authority authorised to receive data under generally applicable law

## **ANALYTICAL ACTIVITIES**

As part of the System, we conduct analytical activities aimed at increasing its intuitiveness and accessibility – in relation to you, this will take place if you consent (e.g. through the appropriate settings in your browser) to such activities. As part of the analysis, we will take into account the way you navigate the Website and use the Application – e.g. how much time you spend on a given subpage or which places you click on. Based on such aggregate information obtained from our Users, we can adapt the layout and appearance of the System and the content posted therein to the needs of Users.

## **PROFILING**

We perform profiling within the System – this will apply to you if you consent to such activities (e.g. through the appropriate settings in your browser).

The profiling we do involves automatically assessing what products or services you may be interested in, using information about the content you view. This will make the advertisements for products or services displayed as part of the online services you use more tailored to you and your needs.

We may also automatically assess which products or services may be of interest to you based on the data you enter into the Autopay application and target offers tailored to you (where we have a valid legal basis for doing so).

In addition to the above, we may improve the performance of the Autopay application within your account to tailor it to your preferences, which are automatically determined based on your previous use of the application. Such improvements may include, for example, automatically

adjusting the display of individual application functions so that the ones you use most often are more visible to you.

The profiling we carry out does not result in decisions that have legal effects on you or similarly significantly affect you.

## SPECIAL CATEGORY DATA

With your consent, we will process your special category data, i.e. your biometric data in the form of a biometric hand identifier, created using an image of your fingerprints and blood vessels in your hand. By processing this type of data, you will be able to take advantage of a unique technological solution that facilitates the purchase of certain services/goods, and we will be able to identify you as the payer. If you do not consent, you will not be able to use our technological solution and you will make your purchase directly from the service provider/seller (e.g. in cash, by payment card – depending on the payment methods available from the service provider/seller).

## DATA SECURITY

When processing your personal data, we use organisational and technical measures in accordance with the relevant legal provisions, including SSL certificate encryption.

In accordance with the law, we provide special protection for your special category personal data, preventing unauthorised persons from accessing it.

## COOKIES AND SIMILAR TECHNOLOGIES

Our Website, like most websites, uses so-called cookies when accessed via a computer, and additionally technologies similar to cookies (identifiers – IDs, software development kits – SDKs, tags and other data collection technologies) in the case of mobile applications. These files:

- are stored in the memory of your device (computer, phone, etc.);
- do not change your device settings.

Within the Website, cookies and similar technologies are used for the following purposes:

- remembering your session,
- statistical purposes,
- marketing,
- sharing Website features.

To learn how to manage cookies and other files, including how to disable them in your browser, you can use your browser's help file. You can find information on this topic by pressing the F1 key

in your browser on a computer, or in the browser settings of your mobile device (e.g. smartphone). In addition, you will find relevant instructions on the following subpages, depending on the browser you use:

- Firefox
- Chrome
- Safari
- Internet Explorer / Microsoft Edge

Below you will find information about the functions of the cookies we process and their validity period.

Cookie name	Cookie expiry period	cookie function
Session	Length of browser session	Maintaining the session of a user who is not logged in
Settings	Forever	User preferences for application use, e.g. language settings
Facebook	3 months	Used to store and track visits between pages in order to target advertisements to people who have visited our website.
Google Analytics	2 years	Used to analyse how users use the website.
Function name	function validity period	purpose
In the mobile application: Application settings	Until uninstalled the application	Used to remember user settings
In the mobile application: Telephone number	For the duration of the session	To streamline processes Applications

By using the appropriate options in your browser, you can at any time:

- delete cookies and similar files,
- block the use of files in the future.

In such cases, we will no longer process them.

You can find more information about cookies on [Wikipedia](#).

## EXTERNAL SERVICES / DATA RECIPIENTS

If you use the services offered by external providers available in the System, we will transfer your data to these entities, which is necessary to provide these services. These entities are separate data controllers and process your data according to their own rules.

We also use the services of external entities that support us in our business activities. In such cases, we entrust them with the processing of your data – these entities process data exclusively on our documented instructions. Below you will find a list of recipients of your data:

ACTIVITY	DATA RECIPIENTS	TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION
Any action in connection with the System	Hosting provider	Yes – United States **
	Data warehouse provider	Not applicable
	Technical/IT support provider	Not applicable
	CRM software provider	Not applicable
	Biometric identification software and equipment provider  Autopay RS Sp. z o.o. ul. Złota 3/18 00-019 Warsaw KRS: 0000971035 NIP: 5252907713 REGON: 522028939	No space
	Autopay S.A. ul. Powstańców Warszawy 6 81-718 Sopot KRS: 0000320590 NIP: 5272898696 REGON: 191781561	No location
	A person cooperating with us on the basis of civil law contracts, supporting our current activities	No space



	Supplier, including in particular the owner or operator of devices (including cameras) and software enabling automatic reading of vehicle registration numbers and transmission of this data to the Autopay application	Not applicable
	<p><b>Applies to the E-Vignette service:</b></p> <p>The relevant authority of the country in which the E-Vignette entitles the holder to travel, as the entity authorised to collect the fee and as the administrator of the data contained in the E-Vignette</p>	Not applicable

	<p><b>Applies to the e-TOLL service:</b></p> <p>The Head of the National Revenue Administration as the entity authorised to collect electronic tolls using the Electronic Toll Collection System (SPOE KAS) and as the administrator of data contained in the register of entities paying electronic tolls, together with entities providing indirect customer service for SPOE KAS</p>	Not applicable
	<p><b>Applies to the e-TOLL service:</b></p> <p>Entity providing warranty and post-warranty service for the OBU device purchased on the Website</p>	Not applicable

	<p><b>Applies to the Purchase Assistance Service:</b></p> <p>The entity operating the online store where you place your order (including making payments) using the Purchase Assistance Service.</p> <p>Due to the nature of the service, Autopay obtains information about the order (its subject and value) from the above-mentioned entity, and Autopay provides the above-mentioned entity your contact details available in the Application necessary to complete the order placed in the shop (in particular to deliver the product).</p>	There is no
	<p><b>Applies to VAT settlement and the National e-Invoice System:</b></p> <p>The Head of the National Tax Administration as the supervisory and controlling entity authorised to collect VAT, as well as the administrator of data from the National e-Invoice System (KSeF) and data transferred as part of the OSS (One-Stop-Shop) procedure.</p>	Not applicable
	Payment provider (Blue Media S.A.)	Not applicable
	Financing service provider	Not applicable
	Accounting office	Not applicable
	Accounting software provider	Yes – New Zealand ***
	Entity providing standard office software and communication software	Yes – United States **
	Hosting and e-mail service provider	Yes – United States **
	Entity providing email security and management system	Yes – United States **

	Software provider for project management	Software project management	Yes – United States **
	Supplier of software for sending electronic communications, including emails		Yes – United States **
	Voice bot provider		Not applicable
	Mobile phone operator		Not applicable
	Bank		Not applicable
	Entity providing secure document destruction stored in paper form		No place
Subscription to the newsletter or your consent to receiving marketing content from us (e.g. information about special offers)	Entity providing marketing services		Not applicable
	Software provider for sending marketing communications, including e-mails		Yes – United States **
	Hosting and email service provider		Yes – United States **
	Entity providing an e-mail security and management system		Yes – United States
	Software provider of project management software	project management	Yes – United States **
	Entity providing standard office software and communication software		Yes – United States **
	Entity providing secure destruction of paper documents		Not applicable

Participation in a survey on satisfaction with our services	Entity enabling satisfaction surveys for the services provided	Not applicable
	Entity providing secure destruction of paper documents	Not applicable
	Entity providing hosting and e-mail services	Yes – United States
	Entity providing an e-mail security and management system	Yes – United States **
	Software provider Software for project management	Yes – United States **
	Entity providing standard office software and communication software	Yes – United States **
Your use of services provided to us by social networking sites	Social media platform	Yes – United States **

**and in addition:** relevant public authorities to the extent that we are required to disclose data to them.

## **TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN ECONOMIC AREA**

In connection with the above, your personal data may also be processed by entities outside the European Economic Area. An adequate level of protection of your data, including through the use of appropriate safeguards, is ensured by:

\*\* the use of standard data protection clauses adopted by the European Commission, referred to in Article 46(2)(c) of the GDPR;

\*\*\* Commission Implementing Decision 2013/65/EU on the adequate protection of personal data in New Zealand.