

# Autopay Mobility System Privacy Policy

Date of update: 23.04.2024

## Dear User!

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

Therefore, below we provide you with the most important information about the principles of our processing of your personal data under the Autopay Mobility System (the "System"), which consists of the Autopay mobile application (the "Application") and the service together with the Autopay web application, located at <https://app.autopay.eu/> ("Service"). In this document we also present information about cookies that are used by the Service.

This information has been prepared taking into account the General Data Protection Regulation (GDPR).

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## PERSONAL DATA CONTROLLER

Autopay Mobility spółka z ograniczoną odpowiedzialnością ul. Powstańców Warszawy 6, 81-718 Sopot registered in the District Court Gdansk - Północ, VIII Commercial Department of the National Court Register under the KRS number: 0000794787, Tax Identification Number NIP: 5272898696, REGON: 383879060, with a share capital of PLN 19,296,959.00.

If you wish to contact us regarding our processing of your personal data, you can send a message to our Data Protection Officer – Ewy Gutkowskiej, at the following email address: [dpo@autopay.pl](mailto:dpo@autopay.pl).

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## YOUR RIGHTS

Your data are processed by us for purposes related to the operation of the System and the provision of services offered therein. With respect to 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),
- their rectification (Article 16 of the GDPR),

- their deletion (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).

As well as the right:

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

Contact our Data Protection Officer if you want to exercise your rights.

You can object to our use of cookies (which you can read about below), in particular by using the widget available at the bottom left corner of the Website page and in the banner displayed when you first visit the Website, or by using the appropriate browser settings.

In addition, if you want to delete your account in our System, you can do so through the Application using the dedicated function.

If you believe that your data are being processed illegally, you can file a complaint with the President of the Personal Data Protection Authority.

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## PERSONAL DATA AND PRIVACY

Below you will find detailed information about the processing of your data depending on your activities.

### 1. Creating an account or using our services - part 1

For what purpose?	
to allow you to use Autopay Mobility services	
On what basis?	
Agreement for services (Article 6(1) (b) of the GDPR)	a legal obligation incumbent on us (related in particular to accounting - in case you use paid services), obliging us to process your personal data (Article 6(1)(c) of the GDPR)
How long?	
until the Agreement for services is terminated	until the expiration of the legal obligation
<i>in addition, your data will be processed until the period in which claims can be asserted - by you or us - has expired. (see the last table of this section for more information)</i>	
What happens if I don't provide the data?	
you will not be able to use Autopay services	

## 2. Creating an account or using our services - part 2

For what purpose?
Adapting our services to the needs of our Users, as well as improving the quality of these services through the feedback we collect from our Users through satisfaction surveys
On what basis?
our legitimate interest in processing your data for the purpose stated above (Article 6(1)(f) of the GDPR)
How long?
for the duration of the agreement or until we take into account your objection to the processing *

*In addition, your data will be processed until the period in which claims can be asserted - by you or us - has expired.  
(see the last table of this section for more information)*

#### What happens if I don't provide the data?

we will not take into account your opinion about our services in the work on their further development

\* whichever is applicable in your case

### 3. Making contact with us (e.g. to ask a question)

#### For what purpose?

Handling your inquiries or requests

#### On what basis?

The agreement or actions taken at your request to conclude it (Article 6(1) (b) of the GDPR) - in the event that your inquiry or application relates to an agreement to which we are or may be a party

Our legitimate interest in processing your data for the purpose of communicating with you (Article 6(1)(f) of the GDPR) - if your inquiry or request is not related to the agreement

#### How long?

For the duration of the agreement binding us or, if no agreement is concluded, for the period of 36 months in case of data provided during a phone call

For a period of 36 months in case of data provided during a phone call or until we take into account your objection against processing \*

*In addition, your data will be processed until the period in which claims can be asserted - by you or us - has expired.  
(see the last table of this section for more information)*

#### What happens if I don't provide the data?

We will not be able to respond to your inquiry or request

\* whichever is applicable in your case

3. Browser settings (in the case of the Service) or other similar action that allows marketing activities to be conducted

For what purpose?
Direct marketing by displaying personalized ads (you can read more about this in the “Profiling” and “Cookies” sections of the Privacy Policy).
On what basis?
Our legitimate interest in processing the data for the purpose stated above (Article 6(1)(f) of the GDPR)
How long?
Until the marketing cookies expire or you delete them, or you otherwise object *
What happens if I don’t provide the data?
You will not receive suggestions for products or services in which you may be interested

\* whichever is applicable in the case and which occurs earliest

4. Browser settings (in case of the Service) or other similar action that allows analytics to be performed

For what purpose?
analyzing how you use our services and how you navigate within the System, in order to adapt them to the Users’ needs and behavior (You can read more about this in the “Analytical activities”, “Profiling” and “Cookies” sections of the Privacy Policy)
On what basis?
Our legitimate interest in processing the data for the purpose stated above (Article 6(1)(f) of the GDPR)
How long?

Until the analytical cookies expire or you delete them, or you otherwise object\*

What happens if I don't provide the data?

we will not take into account your preferences regarding the use of the System or our services

\*whichever is applicable in the case and which occurs earliest

## 5. Newsletter subscription

For what purpose?

sending a newsletter

On what basis?

agreement for the provision of newsletter mailing 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 period in which claims can be asserted - by you or us - has expired.  
(see the last table of this section for more information)*

What happens if I don't provide the data?

you will not be able to receive information regarding the System and our services

## 6. 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)

How long?

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

*In addition, your data will be processed until the period in which claims can be asserted - by you or us - has expired.  
(see the last table of this section for more information)*

What happens if I don't provide the data?

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

## 7. Your consent to the transfer of your personal data to our trusted Partners in order for them to provide you with marketing content (e.g. information about special offers)

For what purpose?

Accepting your consent and conveying it to our Partner

On what basis?

Our legitimate interest in processing the data for the purpose stated above  
(Article 6(1)(f) of the GDPR)

How long?

Until we take into account your objection to the processing\*

*In addition, your data will be processed until the period in which claims can be asserted - by you or us - has expired.  
(see the last table of this section for more information)*

What happens if I don't provide the data?

You will not receive marketing materials from our trusted Partners

## 8. Taking part in a satisfaction survey of our services

For what purpose?

Adapting our services to the needs of our Users, as well as improving 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)
How long?
For the duration of the agreement or until we take into account your objection to the processing*
<i>In addition, your data will be processed until the period in which claims can be asserted - by you or us - has expired. (see the last table of this section for more information)</i>
What happens if I don't provide the data?
We will not take into account your opinion about our services in the work on their further development

\* whichever is applicable in the case and which occurs earliest

## 9. Taking an action or omission that may give rise to claims related to the System

For what purpose?
Determining, investigating or defending possible claims related to the System
On what basis?
Our legitimate interest in processing personal data for the aforementioned purpose (Article 6(1)(f) of the GDPR)
How long?



Until the expiration of the statute of limitations for claims or until we take into account your objection to the processing \*

What happens if I don't provide the data?

inability to establish, assert or defend claims

\* whichever is applicable in the case and which occurs earliest

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## ANALYTICAL / STATISTICAL ACTIVITIES

As part of the System and our services, we perform analytical activities to, among other things, make it more intuitive and accessible - as far as you are concerned, this will be done if you allow (e.g. through the widget for managing your cookie preferences or the relevant settings of your browser) such activities. As part of our analysis, we will take into account how you navigate the Website and use the Application - so, for example, how much time you spend on a particular subpage, or which places you click on. Based on such aggregate information obtained from our Users, we can adjust the layout and appearance of the System and the content posted therein to meet the needs of the Users.

If you use our services, based on your usage, we may also conduct statistical activities to measure which groups of Users choose to use our services and how they use the System. Based on such aggregate information, we can make decisions about the direction of our offerings.

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## PROFILING

As part of the System, we perform profiling - with respect to you, this will take place if you allow (e.g. through the appropriate settings of your browser) such activities.

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

We may also make automatic assessments of what products or services you may be interested in, based on the data you enter into the Autopay app, and target tailored offers to you (where we have a proper legal basis for doing so).

In addition to the above, we may enhance the Autopay application as part of your account to match your preferences, determined automatically based on your past use of the application. Such improvements could include, for example, automatically adjusting the way individual application functions are displayed so that the ones you use most often are more visible to you.

The above-described profiling does not result in decisions that produce legal effects against you or affect you in a similarly significant manner.

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## DATA SECURITY

When processing your personal data, we use organizational and technical measures in accordance with applicable laws, including the use of SSL certificate connection encryption.

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## COOKIES

Our Service, like most websites, uses so-called cookies. These files:

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

As part of the Service, cookies are used for the following purposes:

- remembering your session,
- statistical purposes,
- marketing purposes,
- offering the features of the Service.

You can also find more information about the cookies we use in the widget available in the lower left corner of the Website and in the banner displayed when you first visit the Website.

To learn how to manage cookies, including how to disable them in your browser, you can refer to your browser's help file. You can read more about it by pressing F1 in your browser. In addition, you will find relevant tips on the following pages, depending on the browser you are using:

- Google Chrome
- Opera

- Safari
- Mozilla Firefox
- Microsoft Edge

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

cookie name	cookie validity period	cookie function
Sessional	Browser session length	Maintaining the session of a user who is not logged in
Settings	Forever	Memorized user preferences for using the application, e.g. language setting
Facebook	3 months	Used to hold and track visits between pages in order to target advertising, to people who have visited our site
Google Analytics	2 years	Used to analyze how a user uses the site
In the mobile app: Application settings	Until you uninstall the application	Used to remember user settings
In the mobile app: Telephone number	For the duration of the session	In order to improve processes of the application

Using the appropriate options of your browser, you can at any time:

- delete cookies,
- block the use of cookies in the future.

In such cases, we will no longer process them.

For more information about cookies, see [Wikipedia](#).

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## EXTERNAL SERVICES / DATA RECIPIENTS

In case you use the services available in the System offered by external providers we will transfer your data to these entities what is necessary to provide these services. These entities are separate data controllers and process your data in accordance with their terms.

We also use external entities to support our operations. We then entrust them with your data for processing - these entities process data only on our documented instruction. Below you will find a list of recipients of your data:

ACTION	DATA RECIPIENTS	TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION
Any action in connection with the System	Hosting provider	Yes - United States **
	Data warehouse provider	Does not take place
	Entity providing us with technical/IT support	Does not take place
	CRM software provider	Does not take place
	Entity providing the service of a data protection officer	Does not take place
	Autopay S.A. ul. Powstańców Warszawy 6 81-718 Sopot KRS [National Court Register]: 0000320590 NIP [Tax ID No.]: 5851351185 REGON: 191781561	Does not take place
	Person cooperating with us on the basis of civil law contracts, supporting our current activities	Does not take place

Being within the System with settings that allow marketing activities to take place	Marketing service provider	Yes - United States **
Being within the System with settings that allow analytical activities to take place	Entity facilitating the optimization of the System	Yes - United States **
Making contact with us (e.g. to ask a question)	Hosting and email service provider	Yes - United States **
	Provider of email security and management system	Yes - United States **
	Provider of project management software	Yes - United States **
	Provider of standard office software and communication software	Yes - United States **
	Voice bot provider	Does not take place
	Provider of secure destruction of paper documents	Does not take place
	Chatbot provider	Does not take place

Creating an account or using our services	The owner or operator of a highway, parking lot or other area covered by the service provided via Autopay application	Does not take place
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	Supplier, including in particular the owner or operator of equipment (including cameras) and software that allows automatic reading of vehicle license plate numbers, and transmission of these data to the Autopay application	Does not take place
	<b>Applies to the E-Vignette service:</b> Entity authorized to collect tolls in the country where the E-Vignette entitles the holder to travel, as well as, if applicable, the intermediary for the sale of the E-Vignette	Does not take place
	<b>Applies to the e-TOLL service:</b> Head of the National Tax Administration as authorized to collect the electronic toll via the Electronic Toll Collection System KAS (KAS SPOE) and as the controller of the data contained in the register of electronic toll payers together with the entities providing the KAS SPOE indirect customer service	Does not take place
	Payment provider (Autopay S.A.)	Does not take place
	Accounting office	Does not take place

	Provider of accounting software	Yes - New Zealand ***
	Provider of standard office software and communication software	Yes - United States **
	Hosting and email service provider	Yes - United States **

	Provider of email security and management system	Yes - United States **
	Provider of project management software	Yes - United States **
	Provider of software for sending electronic communications, including emails	Yes - United States **
	Voice bot provider	Does not take place
	Cell phone operator	Does not take place
	Bank	Does not take place
	Provider of secure destruction of documents stored in paper form	Does not take place

	Entity enabling satisfaction survey of services provided	Does not take place
Subscribing to the newsletter or giving your consent to receive marketing content from us (e.g. information about special offers)	Marketing service provider	Does not take place
	Provider of software for sending marketing communications, including e-mails	Yes - United States **
	Hosting and email service provider	Yes - United States **
	Provider of email security and management system	Yes - United States **
	Provider of project management software	Yes - United States **
	Provider of standard office software and communication software	Yes - United States **
	Provider of secure destruction of paper documents	Does not take place
Your consent to the transfer of your personal data to our trusted Partners in order for them to provide you with marketing content (e.g. information about special offers)	Our trusted Partners	Does not take place



Your use of services provided to us by social networks	Social network	Yes - United States **
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**and in addition:** the relevant public authorities to the extent that we are required to share data with them.

## TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

Accordingly, your personal data may also be processed by entities outside the European Union. An appropriate level of protection of your data, including through the use of appropriate safeguards, is ensured by:

\*\* application of standard data protection clauses adopted by the European Commission, as 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.