

# PRIVACY POLICY OF “SPARXMOBILITY.COM” WEBSITE

## 1. DEFINITIONS

Whenever the terms listed below are used in this Privacy Policy, they should be understood in accordance with the definitions indicated below.

- 1.1. **Controller or TH** – Sparx Sp. z o.o. with its registered office in Warsaw, at ul. Rondo I. Daszyńskiego 1 (00-843).
- 1.2. **Personal Data or Data** – any information about a natural person identified or identifiable by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity, including the IP of the device, location data, online identifier, information collected through cookies and other similar technology.
- 1.3. **Policy** – this Privacy Policy, located at:  
<https://www.sparxmobility.com/privacy-policy>
- 1.4. **GDPR** – 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.
- 1.5. **Website** – a website with a collection of all data, information, content and functionalities available through it, located at: <https://www.sparxmobility.com/>
- 1.6. **User** – any natural person visiting the Website or using one or more of the functionalities described in the Policy.

## 2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

- 2.1. In connection with the User's use of the Website, the Controller collects personal data to the extent necessary to provide the services offered, as well as information about the User's activity on the Website. Detailed rules and purposes of the processing of personal data collected when using the Website by the User are described below.
- 2.2. Contact with the Controller is possible through:
  - 2.2.1. E-mail address: [info@sparxmobility.com](mailto:info@sparxmobility.com)
  - 2.2.2. Correspondence address: ul. Rondo I. Daszyńskiego 1, 00-843 Warsaw.

## 3. PURPOSES AND LEGAL BASES OF DATA PROCESSING

### OPERATING THE WEBSITE

- 3.1. Personal data of all persons using the Website are processed by the Controller in order to provide services by electronic means in the scope of making available to Users the content collected on the SPARX Website – the legal basis for the processing is the necessity of processing for the performance of a contract to which the data subject is a party (legal basis for processing: Article 6(1)(b) of the GDPR).

- 3.2. As part of the above purpose, the IP address or other online identifiers and information collected through cookies or other similar technologies may be processed – more information in the section **COOKIES**).
- 3.3. The data will be processed for the duration of providing the service, and after that time for the period necessary to establish, pursue or defend against any claims.
- 3.4. To the extent that the processing of data is necessary to ensure the possibility of using the Website, providing data is voluntary, but necessary to use the Website, and in the remaining scope it is voluntary. You can withdraw your consent at any time through the consent management platform available on the Website. However, the withdrawal of consent does not affect the lawfulness of the previous processing.

#### **DIRECT MARKETING, OFFERS**

- 3.5. The Controller processes personal data for the purpose of conducting direct marketing activities, i.e.:
  - 3.5.1. Conducting direct marketing of the Controller's products or services through the communication channels indicated in the consent (e-mail, phone, SMS) (legal basis: Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Controller consisting in conducting direct marketing of own products or services).
  - 3.5.2. Conducting direct marketing of the Controller's products or services addressed to business partners through the communication channels indicated in the content of the consent (legal basis: Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Controller consisting in conducting direct marketing of own products or services).
  - 3.5.3. Consideration of complaints (legal basis: Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the controller consisting in the possibility of defending and responding to the submitted claims).
- 3.6. The Controller may make personal data available to external entities providing services in the field of postal or courier activities and banks.
- 3.7. The Controller may entrust the processing of personal data in connection with the implementation of the marketing processes to other entities, in particular an external marketing agency and other entities providing technical support for the process.

#### **ENQUIRIES AND COMMUNICATION**

- 3.8. The Controller processes personal data in order to identify the sender and to handle the inquiry, request or notification sent via the contact form available on the Website, which constitutes the legitimate interest of the Controller (legal basis: Article 6(1)(f) of the GDPR) consisting in responding to the submitted inquiry.
- 3.9. The following data may be processed: name and surname, e-mail address or other information that will be provided to us as part of the contact.
- 3.10. The Controller processes the Users' personal data in order to possibly establish and pursue claims or defend against claims (legal basis: Article 6(1)(f) of the GDPR), which is the legitimate interest of the Controller.
- 3.11. Depending on the basis of a possible claim, data related to a specific claim may be processed, in particular correspondence and possible orders.

## COOKIES

- 3.12. On the Website, the Controller and trusted partners use the technology of cookies and other similar technologies. Cookies are small text files installed on the device of the User browsing our Website. Cookies collect information that facilitates the use of the Website – e.g. by remembering the User's visits to the Website and the activities performed by the User. The use of the Website by the User is associated with sending queries to our server. This includes, among others, IP address, as well as information about your web browser and operating system. This data is not associated with specific people using the Website. They only serve to administer the website more efficiently. We analyse these log file data records in order to optimise the TH offering, as well as to detect and rectify errors faster and to manage server performance. The above technologies will be collectively treated as cookies under the Privacy Policy.
- 3.13. The Controller processes Users' personal data in order to:
  - 3.13.1. to provide services – in order to provide Users with the services and functionalities of the Website that the User wants to use. Necessary cookies may be installed only by the Controllers via the Website (legal basis: Article 6(1)(b) of the GDPR);
  - 3.13.2. for analytical purposes – for the purpose of conducting analytics and achieving statistical purposes – the legal basis for the processing consisting in the analysis of the Users' activity in order to improve the functionality and services provided is the legitimate interest of the administrator consisting in keeping statistics on the use of the Website in connection with the consent expressed by the User via the cookie banner (legal basis: Article 6(1)(f) of the GDPR);
  - 3.13.3. for marketing purposes – in order to provide advertisements and assess their functioning on the Website – the legal basis for the processing consisting in the analysis of the Users' activity in order to improve the functionality and services provided is the legitimate interest of the administrator consisting in conducting advertising activities based on the consent expressed by the User via the cookie banner (legal basis: Article 6(1)(a) of the GDPR).
- 3.14. The following User data may be processed: IP address, other identifiers and data saved in cookies or other similar technologies.
- 3.15. The use of cookies for the purpose of providing services is necessary to use the Website. The use of cookies for analytical and marketing purposes is voluntary and takes place in accordance with the consent expressed by the User. The consent may be withdrawn at any time using the functionalities of the Website.
- 3.16. If consent is given, it is voluntary and can be withdrawn at any time via the consent management platform. Cookies can be managed through the consent management platform available on the Website, which allows the cookies used to be adapted to the User's preferences.
- 3.17. You can change your browser settings accordingly to prevent cookies. Changing your browser settings may restrict the use of both service and analytical and marketing cookies. However, please be advised that this may significantly hinder or prevent the use of the Website.

- 3.18.** To do this, use the option of the web browser used to connect to the Website and select the option of automatic rejection of cookies. These settings usually also allow you to manage cookies.
- 3.19. Below you will find links to examples of official websites of the manufacturers of the most commonly used web browsers, where you can find information about the steps needed to change the settings of a given browser in the above-described scope:
- 3.19.1. Microsoft Edge:  
<https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>.
- 3.19.2. Mozilla Firefox:  
<https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>.
- 3.19.3. Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>.
- 3.19.4. Opera: <https://help.opera.com/en/latest/security-and-privacy/>.
- 3.19.5. Safari:  
<https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>.

#### **4. DATA RETENTION**

- 4.1. As a rule, the data is processed for the duration of the service, until the consent is withdrawn or an effective objection to the processing of data is made in cases where the legal basis for data processing is the legitimate interest of the Controller.
- 4.2. The period of data processing may be extended if the processing is necessary to establish and pursue possible claims or defend against claims, and after this time only in the case and to the extent required by law. After the expiry of the processing period, the data is irreversibly deleted or anonymized.

#### **5. DATA RECIPIENTS**

- 5.1. In connection with the provision of services, personal data will be disclosed to external entities, including in particular suppliers responsible for the operation of IT systems, entities such as courier companies, efficient return and complaint handling system, hosting, customer communication system, payment systems and banks, accounting, legal, auditing, consulting services,
- 5.2. Personal data may be transferred outside the European Economic Area ("EEA") to third countries that do not guarantee the same level of protection as is required in the EU. In order to protect your personal data, TH will only transfer data (i) on the basis of a decision of the European Commission that allows it, or (ii) on the basis of EU-approved standard contractual clauses.

#### **6. RIGHTS OF DATA SUBJECTS**

- 6.1. Each person has the right to request access to their data, rectification, deletion, transfer, restriction of processing, to lodge a complaint against processing and lodge a complaint with the President of the Office for Personal Data Protection, as well as to withdraw

consent at any time without affecting the lawfulness of the processing that was made on the basis of consent before its withdrawal.

- 6.2. The right to object to data processing is granted in the case of data processing on the basis of the legitimate interest of the data administrator.

## **7. CHANGES TO THE PRIVACY POLICY**

- 7.1. The provisions of the Privacy Policy may be improved or amended, and the latest versions will be published on the TH Website from time to time and will be marked with the date of the last update.
- 7.2. In matters not covered by the Privacy Policy, the provisions of the Civil Code and relevant acts of Polish law, as well as European Union law, in particular the GDPR, shall apply.
- 7.3. The policy has been in force since 13.03.2026.