

PRIVACY AND COOKIES POLICY

ON THE WEBSITE <https://bergman-international.com/>

Introduction

1. General provisions

This privacy policy and the use of cookies applies to information on data processing in connection with the use of the website <https://bergman-international.com/> (hereinafter referred to as the Website).

The Administrator respects the Website Users' right to privacy. In particular, the Administrator cares for the protection of their Personal Data and applies appropriate organizational and technical solutions to prevent interference with Users' privacy by third parties. The Administrator's actions are aimed at guaranteeing the User a feeling of full security at a level appropriate to the applicable law.

Entering and using the Website means that the User accepts the terms of this Policy.

The Website may contain links redirecting to other websites. Websites will open in the same or new browser window. The Administrator is not responsible for the content provided by these websites, as this privacy policy and the use of cookies applies only to the Website <https://bergman-international.com/>. The User is obliged to read the privacy policy or regulations in force on the website which the User has entered via the referring link.

2. Personal Data of the User

1. Who is the Administrator of the User's Personal Data?

The Administrator of Personal Data processed in connection with the operation of the Website and the provision of its Services is Bergman International.

3. What Personal Data is processed by the Administrator?

2.1. Depending on the type of services provided on the website, the Administrator processes the following Personal Data of the Website Users:

2.1.1. for the Website's services: personal data only of those Users who have consented to the processing of cookies and similar technologies:

- hostname;
- browser type;
- type of operating system;
- access time;
- addresses of website visitors on the Website;
- address of the website from which the User came to the Website;
- other User identifiers.

2.1.2. for the Form service: all information provided voluntarily by the User, which will be necessary to resolve the case initiated by the User; in particular, it may be the following data:

- identifying, such as name, surname,
- contact details, such as e-mail address, telephone number,
- other information provided by the User.

3.1. Be advised that by using the Website without changing the software / browser settings, the User does not consent to the storage of cookies on their device, or the use of information stored in them. By default, the browser has the settings that allow the processing of said data disabled.

3.2. If it is necessary to conduct a procedure to determine possible claims or defend against them, including a complaint procedure, the data identifying the participants in the procedure will be processed, including the name and surname and any additional data necessary to conduct the procedure.

4. Is the provision of Personal Data by the User obligatory?

4.1. Site service

Providing Personal Data indicated in paragraph 2.1.1. is voluntary. The User's activity on the Website, including their Personal Data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and activities related to the IT system used to provide services by the Administrator). Information about the visited pages and the use of the Website and the Services available within it are also provided by cookies. All these tools contribute to the user-friendliness of the Website. Therefore, failure to provide them may affect the convenience of using the Website, prevent the use of a part of the Website, or prevent the display of some information intended for the User.

3.2. The form

Providing Personal Data in the form is voluntary, but necessary to contact the User. Failure to provide Personal Data results in the inability to use the Form service.

5. For what purpose and on what legal grounds is Personal Data processed?

The Administrator processes Personal Data for the following purposes:

- a) in order to provide the Services available on the Website by electronic means, i.e. the Website service and the Form service, including ensuring the technical security of the website and website management – the legal basis for processing is the necessity of processing data to perform the contract for the use of the Website services;
- b) in the case of sending marketing content to the User as part of own marketing, the legal basis for processing is the legitimate interest of the Administrators, which is the promotion of the Administrator's and their Capital Group's services;
- c) in order to potentially establish and pursue claims or defend against them, the legal basis for processing is the Administrator's legitimate interest in protecting their rights.

6. How long is Personal Data processed?

The period of processing Personal Data by the Administrator depends on the type of service provided and the purpose of processing. The period of processing Personal Data may also result from legal provisions when they constitute the basis for processing. In the case of processing Personal Data on the basis of the Administrator's legitimate interest, e.g. for security reasons, the data is processed for a period enabling the implementation of this interest or until an effective objection to data processing is raised. If the processing is based on consent, Personal Data is processed until its withdrawal. When the basis for processing is necessary to conclude and perform the contract, Personal Data is processed until its termination / expiry. The period of processing Personal Data may be extended if the processing is necessary to establish or pursue claims or defend against claims, and after this period - only if and to the extent that it will be required by law. After the expiry of the processing period, Personal Data is irreversibly deleted or anonymized.

7. Recipients of Personal Data

6.1. Users' Personal Data may be made available to entities providing services on request of the Administrator and on their behalf, e.g. for the operation of the Website and available Services, in particular in the field of IT services, marketing services, analytical services, archiving, professional consulting. The Administrator will provide this data on the basis of a contract for entrusting the processing of personal data or other legal instrument, which will ensure adequate protection of the Personal Data provided.

6.2. The Personal Data processed by the Administrator will not be made available to third parties, subject to paragraph 6.1., unless:

- a) the transfer of Personal Data serves the purposes of protecting the Administrator's rights or settling disputes; or
- b) the User has consented to the transfer of personal data to third parties.

6.3. In each of the above Situations, Personal Data may be made available only if there is an important legal basis for it (i.e. consent, e.g. in the case of marketing, contract or legitimate interest).

6.4. The Administrator undertakes not to sell the Users' Personal Data.

7. Is the User profiled based on their Personal Data, and are automatic decisions that affect the User made on this basis?

The administrator uses anonymised Personal Data to perform the evaluation and profiling in an automated manner. This evaluation and profiling are carried out to analyse data on the User's activity on the Website, to collect demographic data about the User, or to personalize the content of the Website in order to run it. This profiling has no legal consequences for the User, nor does it have any impact on the User's ability to use the Website. Therefore, this data is processed only for the purposes of administering the website and ensuring efficient service.

8. User rights

1. Right of access

At any time, the User has the right to obtain information as to whether their Personal Data is being processed by the Administrator and to what extent. If the Administrator processes their Personal Data, the User may gain access to it or may ask the Administrator for a copy of the Personal Data subject to processing. The first copy of Personal Data is free of charge, the issuance of further copies may be subject to a fee.

2. The right to correct Personal Data

The User may at any time request the Administrator to immediately correct the Personal Data which is incorrect or incomplete.

3. The right to limit the processing of Personal Data

The User may at any time request the restriction of the processing of their Personal Data by the Administrator. If the request is justified, the Administrator will only be able to store this Personal Data. Undertaking any operations other than storage will require separate consent, unless the processing is necessary due to the protection of claims or rights of another person or due to important reasons of public interest.

4. The right to transfer Personal Data

If the User's Personal Data is processed in an automated manner on the basis of the User's consent or in connection with the fulfilment of the contract, the User may at any time request the Administrator to receive a copy of their Personal Data in a structured, commonly used machine-readable format. At the request of the User, Personal Data will be sent by the Administrator to another administrator indicated by the User, if technologically possible.

5. The right to delete Personal Data (the so-called right to be forgotten)

The User has the right to request immediate removal of their Personal Data by the Administrator.

6. The right to object

If the Administrator processes the User's Personal Data on the basis of a legitimate interest, the User may object to this processing at any time.

7. The right to withdraw consent

- 8.1. The User may withdraw the consent given to the processing of their Personal Data at any time. Withdrawal of consent, however, does not affect the lawfulness of the processing which was carried out on its basis prior to its withdrawal.
- 8.2. In order to withdraw consent effectively, in the case of using the Website and its Services, the User should contact the Administrator in the manner indicated in chapter III.9.6.
- 8.3. The administrator ensures that the request to withdraw consent will be considered immediately. After completing the request, the Administrator will cease to process the User's Personal Data processed on the basis of consent (including for the purpose of receiving marketing and commercial information by e-mail

and by phone). Until the application is processed, however, it may happen that the User receives information to which they no longer consent, due to the time needed to execute the application in the User's systems.

- 8.4. Withdrawal of consent to the processing of Personal Data by the User does not exclude further processing of this Personal Data, with the proviso that further processing will take place for a different purpose and on a basis other than the processing carried out on the basis of consent.

8. The right to lodge a complaint

The User has the right to lodge a complaint with the supervisory body dealing with the protection of Personal Data. The Administrator proposes to contact them directly in the manner indicated in chapter II.9.6, which may simplify and speed up the settlement of the matter.

9. How can the User contact the Administrator and exercise their rights?

- 8.5. When sending a request to the Administrator, the User should do it in such a way as to clearly determine what the request concerns, i.e. in particular:
- a) which right the User wants to exercise;
 - b) what processing item the request concerns.
- 8.6. If the Administrator is unable to identify the person submitting the application on the basis of the submitted application, they will ask the User for additional information.
- 8.7. The application may be submitted in person or through an attorney. Due to the security of Personal Data, the Administrator encourages the use of a power of attorney in a form certified by a notary or authorized legal counsel or attorney, which will significantly speed up the verification of the authenticity of the application.
- 8.8. The reply to the application should be given within one month of its receipt. If it is necessary to extend this period, the Administrator informs the applicant about the reasons for the extension.
- 8.9. The answer is provided via traditional mail, unless the application was submitted by e-mail or an electronic response was requested.
- 8.10. In order to exercise their rights, the User may contact the Administrator:
- a) in writing, by sending correspondence to the Administrator's address;
 - b) in the form of an e-mail to the e-mail address

III. Cookies and other internet technologies

In order to improve the Website, to facilitate its use and adapt it to the User's needs, the Administrator uses cookies and other Internet technologies.

1. Cookies

1.1. The Website uses two basic types of cookies:

- a) "session" cookies – which are temporary files stored on the User's end device until logging out, leaving the website, or turning off the software (web browser);
- b) "persistent" cookies – which are stored on the User's end device for the time specified in the parameters of cookies or until they are deleted by the User.

8.11. Cookies are used for the following purposes:

- a) adjusting the content of the Website's pages to the User's preferences and optimizing the use of pages; in particular, these files allow to recognize the device of the Website User and properly display the website, tailored to the User's individual needs;
- b) creating statistics that help to understand how the Users of the Website use the pages, which allows to improve their structure and content.

8.12. We use the following cookies on the Website:

- a) necessary - absolutely necessary for the proper functioning of the website. This category only includes cookies that ensure basic functionalities and security features of the website. These cookies do not store any personal information.
- b) functional - they help to perform certain functions, such as sharing the content of the website on social media platforms, collecting feedback, and other functions of third parties.

- c) performance - they are used to understand and analyse the website’s KPIs, which helps to provide a better user experience for visitors.
- d) advertisement - they are used to provide visitors with relevant advertisements and marketing campaigns. They track visitors on sites and gather information to deliver tailored advertising.
- e) other uncategorized - they are analysed and have not yet been classified into other categories.
- f) analytical - they are used to understand how visitors interact with the website. They help to provide information on visitor counts, bounce rate, traffic source, etc.

8.13. In many cases, the software used for browsing websites (web browser) allows cookies to be stored on the User’s end device by default. The consent of the User to accept cookies takes place by expressing consent in the appropriate window on the Website. Website Users can change their cookie settings at any time. These settings can be changed in particular in such a way as to allow automatic handling of cookies in the web browser settings or to inform about their every posting on the User’s device. Detailed information on the possibilities and methods of handling cookies is available in the software (web browser) settings.

8.14. Be advised that restricting the use of cookies may affect the convenience of using the Website, prevent the use of parts of the Website or Services, or prevent the display of some information intended for the User. Above all, however, it will prevent the Administrator from obtaining anonymous statistical information to improve the quality of the Website.

1. Other Internet technologies

8.15. In order to conduct marketing and remarketing activities, the Administrator uses the following technologies to observe the activities undertaken by Users on the Website:

- a) Facebook conversion pixel (currently Meta) - Pixel Facebook uses the “Cookies” technology, i.e. text files placed on the User’s device, in order to enable the Administrator to analyse the sources of traffic and the manner in which the visitors use it. Pixel Facebook collects data on its servers, obtained from placing cookies on devices, and uses this information to create reports and provide other services related to the movement and use of the Internet. Pixel Facebook may also transfer this information to third parties if it is required to do so by law or if these persons process such information on behalf of Facebook. This data is never combined with the data provided by the User, and it is only material for statistical analysis and mechanisms for correcting system errors;
- b) Google Analytics - Google Analytics uses the “Cookies” technology, i.e. text files placed on the User’s device, in order to enable the Administrator to analyse the sources of traffic and the manner in which the visitors use it. Google collects data on its servers, obtained from placing cookies on devices, and uses this information to create reports and provide other services related to traffic and Internet use. Google may also transfer this information to third parties if it is required to do so by law or if these persons process such information on behalf of Google. This data is never combined with the data provided by the User, and it is only material for statistical analysis and mechanisms for correcting system errors;

8.16. As a result of the use of other internet technologies, the User’s personal data may be shared with entities with which the Administrator cooperates, e.g. with Facebook, Instagram and others. The Administrator will transfer this data only if the User agrees on the Website to transfer their Personal Data for marketing purposes to entities cooperating with the Administrator.

Cookie files and other internet technologies used by the Administrator:

NAME OF THE COOKIES	PERIOD OF VALIDITY	TYPE OF COOKIES	COOKIE DESCRIPTION
CookieLawInfoConsent	1 year	Necessary	Records the default state of the corresponding category button and CCPA state. Only works in coordination with the primary cookie.
cookielawinfo-checkbox-necessary	1 year	Necessary	Set by the Cookie Consent plugin, this cookie is used to record the User’s consent to cookies under the “Necessary”

			category.
cookieinlawinfo-checkbox-functional	1 year	Necessary	The cookie is set by the Cookie Consent plugin to record the User's consent to cookies under the "Functional" category.
cookieinlawinfo-checkbox-performance	1 year	Necessary	This cookie, set by the Cookie Consent plugin, is used to store the User's consent for cookies in the "Performance" category.
cookieinlawinfo-checkbox-analytics	1 year	Necessary	This cookie, set by the Cookie Consent plugin, is used to record the User's consent to cookies in the "Analytics" category.
cookieinlawinfo-checkbox-advertisement	1 year	Necessary	This cookie, set by the Cookie Consent plugin, is used to record the User's consent to cookies in the "Advertisement" category.
cookieinlawinfo-checkbox-others	1 year	Necessary	This cookie, set by the Cookie Consent plugin, is used to record the User's consent to cookies under the "Others" category.

9. Changes to the Privacy Policy

The Personal Data Administrator declares that this Privacy Policy is verified on an ongoing basis and, if necessary, updated. The current version of the Privacy Policy is valid from 12.08.2022
According to the needs, the Administrator may change and supplement the Privacy Policy. Users will be informed about any changes or additions on the Website.