

Information on the processing of personal data:

	for users of our websites or mobile applications:	for users of MultiSport and MultiLife Programs:
Who is the personal data controller:	Benefit Systems S.A. with its registered office in Warsaw, Plac Europejski 2, 00-844 Warsaw (hereinafter referred to as 'we' or 'Benefit Systems').	
	If you are a user of the MyBenefit System and make use of the functionality of the HR tools or submit statements or requests to your employer or other similar functionalities, then your employer is the administrator of personal data processed within these functionalities. For information regarding this processing, please contact your employer directly.	
How to contact us:	You can contact us in any of the following ways: <ul style="list-style-type: none"> • using the contact form https://www.benefitsystems.pl/pomoc-i-obsluga/rodo/; • via e-mail to: daneosobowe@benefitsystems.pl; and • by post to the address: Pl. Europejski 2, 00-844 Warszawa, in an envelope marked "Personal data". 	
Have we designated a Data Protection Officer:	We have designated a personal data officer , who can be contacted in any matters concerning the processing of your personal data by us. You can do this by e-mail to: iod@benefitsystems.pl or via post to the address: Benefit Systems S.A. Pl. Europejski 2, 00-844 Warszawa, in an envelope marked "IOD".	
What personal data do we process and where do we collect them from:	We will process your personal data that you provide, leave, or to which we may gain access in connection with your use of our websites or mobile applications.	We will process the following categories of personal data concerning you or your child: identification data, contact data, data related to the MultiSport card or the MultiLife product, data concerning the use of services under the MultiSport or MultiLife Programme (including services provided by our Partners and providers of additional

	<p>We may also process your data, which we receive from your employer (e.g. in order to create your account in the MyBenefit System).</p> <p>We may also receive your data from entities that offer you additional services in connection with your account on our websites and mobile applications, or from external authentication service providers (e.g. Facebook, Apple).</p> <p>Additionally, we may process your child's personal data, if you have provided us with such.</p> <p>The data we process, include in particular:</p> <ul style="list-style-type: none"> • the data you or your employer provide in the process of registering an account on our websites and our mobile applications, as well as during the use of our websites and applications; • data concerning your activity on our websites and in our mobile applications (e.g. data about pages you visit, bookmarks, how much time you spend there, etc.); • if you use the facility search engine and turn on the geolocation function, we will process your geolocation data in order to show you facilities located near your location; • if you upload your or your child's photo to our application in order to obtain a Confirmed Identity, we will process it to guarantee you or your child the Confirmed Identity functionality and in order to send it back to your e-mail address, if you would like to use facility services while a QR code or token number cannot be generated in the Multisport app; • data relating to your device through which you use our websites or mobile applications: IP address, data stored in cookies or other similar technologies (see: 'Cookies'). We also process data comprising contents 	<p>services offered in connection with the MultiSport or MultiLife Programme), data concerning the entity through which the card was ordered (i.e. your employer or the employer of the person who enabled you to use the MultiSport or MultiLife Programme), as well as the month and year of birth.</p> <p>We receive the data directly from you, e.g. through the registration form, from our Client (i.e. your employer or the employer of the person who enabled you to use the MultiSport or MultiLife Programme), or from providers of additional services offered in connection with the MultiSport or MultiLife Programme.</p>
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	<p>of HTTP requests transmitted from your device to our server (URL, IP address, browser data, date and time of the request, HTTP response code, error information, cookie ID, page resources viewed). The data so collected are recorded in server logs.</p>	
<p>How we process data:</p>	<p>We will process your personal data and your child's personal data, if you have provided us with such, for the purposes of:</p> <ul style="list-style-type: none"> • providing access services and account maintenance services on our websites and in our mobile applications as well as enabling the use of services available on those websites and mobile applications (including enabling the purchase, delivery, and settlement of orders in the MyBenefit System or on the MultiLife Platform) – because it is necessary for the performance of the contract between you and Benefit Systems (legal basis - Article 6(1)(b) of the GDPR); • where we collect special categories of data in order to provide you with a service or where we transfer such personal data to external entities, we process your data on the basis of your explicit consent (legal basis – Article 9(2)(a) GDPR). The provision of this data is always voluntary, but may be necessary in order to use the service in question; • in case you are a member of the MultiSport or MultiLife Programme, we provide you with services related to the use of the MultiSport or MultiLife Programme because you have given us your consent, which may also be expressed through your explicit application to the Programme directly to us or through the employer (legal basis - Article 6(1)(a) of the GDPR); • related to compliance with our legal obligations – we may have obligations arising from applicable laws that require us to process your personal data; in particular, 	<p>We will process your personal data or your child's personal data for the following purposes:</p> <ul style="list-style-type: none"> • provision of services related to the use of the MultiSport Programme, because you have granted your consent thereto (legal basis: point (a) of Article 6(1) GDPR). Consent may also be expressed through your explicit registration for the MultiSport or MultiLife Programme directly with us or with the employer; • tax and accounting purposes, because this is required under applicable legal regulations (legal basis: point (c) of Article 6(1) GDPR); • enabling you to place an order for a MultiSport card or a MultiLife product, based on our legitimate interest (legal basis: point (f) of Article 6(1) GDPR); • establishment, exercise or defence of legal claims, based on our legitimate interest (legal basis: point (f) of Article 6(1) GDPR); • analysis and statistical purposes for marketing needs and satisfaction surveys, based on our legitimate interest (legal basis: point (f) of Article 6(1) GDPR); • if you are an adult: direct marketing, including profiling, based on our legitimate interest (legal basis: point (f) of Article 6(1) GDPR). For profiling purposes, we may combine the information we obtain about you when you use our various products and services, including, among others, information obtained when you visit our website as a registered user.

	<p>this concerns compliance with tax and accounting obligations (legal basis – Article 6(1)(c) GDPR);</p> <ul style="list-style-type: none">• server administration and security assurance for statistical purposes and for the purposes of facilitating the use of our websites and mobile applications on the basis of our legitimate interest consisting in improving the functionality of services provided by us electronically (legal basis – Article 6(1)(f) of the GDPR);• exercising, establishing or defending legal claims. We act on the basis of our legitimate interest consisting in the ability to establish or defend a legal claim (legal basis – Article 6(1)(f) of the GDPR or Article 9(2)(f) of the GDPR in case of special categories of personal data;• in connection with carrying out marketing activities – we may process your personal data: (i) for the purposes of marketing communications, including mailing commercial information and presenting offers in pursuit of our legitimate interest that consists in presenting you with marketing contents, including contents tailored to you on the basis of profiling, in connection with your consent to use the communication channel you have chosen for this purpose; ii) for the purposes of online marketing activities in pursuit of our legitimate interest that consists in presenting advertisements and offers, including those tailored to your potential needs and interests on the basis of profiling, in connection with your consent to the use of cookies or similar technologies or, where applicable, in connection with your consent to our use of information on your location for marketing purposes; iii) for the purpose of carrying out analyses and statistics for marketing purposes and for the purpose of surveying satisfaction with our services in pursuit of our legitimate interest that consists in improving the quality of our	
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	customer service and optimizing the products and services offered by us (legal basis – Article 6(1)(f) of the GDPR).	
How long will your personal data be stored:	<p>After you have finished using our websites or mobile applications, we will process your data for as long as they are stored in the server logs</p> <p>If you have an account on our websites or in our applications, we will keep your data until you delete your account.</p> <p>Where we process your data for the purposes of complying with our legal obligations, we will do so for the time necessary to comply with our legal obligations, in particular as required by applicable law.</p> <p>Where we process your personal data based on our legitimate interests, we will do so until you lodge an effective objection, unless they cease to be necessary for the purposes of our legitimate interests (e.g. the limitation period for claims expires).</p> <p>Where we process your data based on your consent, we will process them no longer than until its withdrawal.</p>	<p>We store your personal data or your child’s personal data for the following periods:</p> <ul style="list-style-type: none"> • for the purpose of providing services related to the use of the MultiSport or MultiLife Programme – until you opt out of participation in the MultiSport or MultiLife Programme or withdraw your consent, whichever occurs first; • for the establishment, exercise or defence of legal claims – until the expiry of the limitation period for such claims; • for purposes resulting from our legitimate interests – no longer than until an effective objection is lodged, unless the data become unnecessary earlier for the realisation of those interests; • for tax and accounting purposes – for the period required under applicable regulations.
Is providing data compulsory:	<p>As a rule, providing personal data is not compulsory, but may be necessary for you to use the services provided by Benefit Systems, e.g. to enter into a contract with us.</p> <p>Therefore, your failure to provide your data may in some instances make it impossible for us to provide services. Our forms used to collect data clearly indicate the data the provision of which is necessary.</p>	<p>The disclosure of data by you is voluntary, but it is necessary to provide the service. Failure to provide data will result in the inability to provide the service.</p>
Do we make automated decisions:	<p>We do not make any decision concerning you which would be based solely on automated processing of your information which would produce legal effects concerning you or similarly affect you in a significant way.</p>	

<p>Who do we transfer your data to:</p>	<p>Your personal data may be transferred to the following entities: entities of the Benefit Systems Group, hosting and maintenance service providers for our websites and mobile applications, ICT and IT support and security service providers, data storage and destruction service providers, entities providing services for our clients and other stakeholders (e.g. couriers, payment operators) and supporting our marketing activities, to legal counsels and auditors, as well as your employer. Your data may also be transferred to our affiliated entities that offer additional services in connection with your ownership of an account on our website or in our mobile applications (e.g. consultants and partners whose services you access through our websites or mobile applications), as well as to social network operators.</p> <p>Your data may also be transferred to public authorities in cases provided for by law.</p> <p>If you use the function of making the Virtual Kids Card available to other users registered in our MultiSport application, your child's personal data will be disclosed to the users indicated by you.</p>	<p>Your data can be transferred to the following entities: entities of the Benefit Systems Group, Partners (sport and recreational facilities), providers of additional services offered in relation to the MultiSport Programme or MultiLife Programme, the Client (i.e. your employer or the employer of the person who enabled you to use the MultiSport or MultiLife Programme), payment operators, entities printing MultiSport card, entities providing website and application repair and maintenance services, entities providing tele-information services and IT support and security services, entities providing services involving storage and deletion of data carriers, entities providing user services and supporting our marketing activities, legal advisors and auditors. Your data can also be transferred to public authorities in instances required by the law.</p>
<p>Are your data transferred outside the European Economic Area:</p>	<p>As a rule, your personal data are not transferred outside the European Economic Area (EEA). Some of the data recipients (such as technological solution providers) may process them in third countries. We make every effort for the provision of data to these providers to be lawful. If the European Commission has not issued a decision confirming that a given third country ensures an adequate level of personal data protection, we ensure that data transfers are carried out on the basis of other legal protection measures, e.g. based on standard contractual clauses or codes of conduct. You can contact us to obtain copies of the implemented security measures. You can find contact details disclosed in the "How to contact us" or "Have we designated a Data Protection Officer" above.</p>	

What are your rights:	<p>You have the following rights related to the processing of your or your child personal data:</p> <ul style="list-style-type: none">• right to withdraw your consent to the processing of personal data at any time; this shall not affect the lawfulness of processing based on consent before its withdrawal;• if you are and adult – right to object to processing of your personal data for the purposes of direct marketing, including profiling;• right to object to processing of your or your child personal data due to your special situation;• right of access to data;• right to request rectification of data;• right to request erasure of data;• right to request restriction of the processing of data;• right to personal data portability. <p>In order to exercise the aforementioned rights, please contact us or our data protection officer using contact details disclosed in the “How to contact us” or “Have we designated a Data Protection Officer” above.</p>
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More information about the processing of your personal data can be found in our Privacy Policy:
<https://www.benefitsystems.pl/en/privacy-policy/>.