

## PRIVACY POLICY

Version: current

### 1. Personal Data Controller

The controller of your personal data is:  
TIMEX S.A.  
Ul. Bonifraterska 17, 00-203 Warsaw  
E-mail: [info@timexsa.pl](mailto:info@timexsa.pl)

The company has not appointed a Data Protection Officer, as under the applicable regulations there is no obligation to appoint one. In matters concerning personal data protection, you may contact the controller directly at [info@timexsa.pl](mailto:info@timexsa.pl)

### 2. Purposes and legal bases for data processing

Your personal data may be processed for the following purposes:

Purpose of processing	Legal basis	Notes
Performance of a contract or business contact in business matters	Art. 6(1)(b) GDPR	Data necessary for contact within B2B cooperation.
Direct marketing by electronic means (e-mail, SMS) or telephone – after consent has been given	Art. 6(1)(a) GDPR + Art. 10(2) of the Act on Providing Services by Electronic Means / Art. 172 of the Telecommunications Law	Applies to consent-based marketing.
Direct marketing within a B2B relationship – based on the legitimate interest of TIMEX S.A.	Art. 6(1)(f) GDPR	Applies to commercial offers addressed to companies that cooperate or were clients.
Profiling for marketing purposes	Art. 6(1)(a) or (f) GDPR	Analysis of preferences in order to tailor offers. The person has the right to object to profiling.
Website event analysis (GTM)	Art. 6(1)(f) GDPR	Monitoring forms, clicks, and interactions for optimization and marketing purposes.
Google / Meta advertising forms (Lead Ads)	Art. 6(1)(a) or (b) GDPR	Collection of first name, last name, e-mail, phone number for contact and marketing (after consent has been given).
Phone calls generated from advertisements (Google Ads Call Tracking)	Art. 6(1)(f) GDPR	Analysis of the effectiveness of marketing campaigns and implementation of business contact.

#### Notes:

- In the case of marketing based on legitimate interest, you always have the right to object to the processing of data for marketing and profiling purposes (Art. 21 GDPR).
- In the case of marketing based on consent, you may withdraw your consent at any time, without affecting the lawfulness of processing before its withdrawal.

### 3. Data retention period

Type of processing	Retention period
Processing based on consent	Until it is withdrawn
Processing based on legitimate interest	Maximum 5 years from the last contact or business interaction; after this period, the data will be deleted or anonymized

### 4. Data recipients

Your data may be disclosed to:

- employees and associates of TIMEX S.A.,
- entities processing data on the basis of data processing agreements (e.g., marketing agencies, IT service providers),
- authorities or entities authorized by law (e.g., tax authorities),
- in the scope of marketing and promotion – cooperating business partners and third parties only for the purpose of implementing marketing activities.

### 5. Rights of the data subject

You have the right to:

1. Access your data and rectify it,
2. Erase data ("right to be forgotten"),
3. Restrict processing,
4. Data portability,
5. Object to processing for marketing or profiling purposes,
6. Withdraw consent at any time (applies to processing based on consent),
7. Lodge a complaint with the President of the Personal Data Protection Office (UODO).

Method of objection:

- By e-mail to: [sprzeciw@timexsa.pl](mailto:sprzeciw@timexsa.pl), by phone at +48 661 054 054, or in writing to the company's address.
- The objection will be considered without undue delay, and processing of your data for marketing purposes will be discontinued.

### 6. Profiling

Your data may be subject to profiling for direct marketing purposes, i.e., analysis of preferences and behaviors in order to tailor offers of TIMEX S.A. products or services.

- You have the right at any time to object to profiling.
- The objection should be sent to [sprzeciw@timexsa.pl](mailto:sprzeciw@timexsa.pl), submitted by phone at +48 661 054 054, or in writing to the company's address, and profiling will be discontinued without undue delay.

### 7. Google Tag Manager and event analysis

GTM is used to monitor interactions on the website: form submissions, clicks, scrolling.

Data may be transferred to providers of analytical and advertising services (e.g., Google, Meta).

Users may manage cookie settings and opt out of tracking in the browser or advertising tools.

### 8. Advertising forms and advertising calls

Google and Meta Lead Ads: first name, last name, e-mail address, and phone number are collected for business contact and marketing after consent has been given.

Google Ads Call Tracking: the phone number and call duration are recorded in order to measure campaign effectiveness and carry out business contact.

The legal basis for processing is consent (Art. 6(1)(a)) or legitimate interest (Art. 6(1)(f)).

## 9. Cookies

Cookies are used for: adjusting the website to the user, analyzing statistics, maintaining the session, marketing.

Types: necessary, security, performance, functional, advertising.

Detailed information about cookies and their management can be found in the "Cookie Policy" section.

## 10. Voluntary provision of data

- Data necessary for contract performance are mandatory – failure to provide them makes cooperation impossible.
- Consent to marketing by electronic means or telephone is voluntary.
- Lack of consent does not affect the possibility of cooperation or contract performance.

## 11 Contact regarding personal data matters

- General matters concerning personal data: [info@timexsa.pl](mailto:info@timexsa.pl)
- Objection to processing for marketing and profiling purposes: [sprzeciw@timexsa.pl](mailto:sprzeciw@timexsa.pl)

In the event of any discrepancies or ambiguities between language versions of this Privacy Policy, the Polish version shall prevail.