

Privacy Policy

Privacy Policy on the Internet

[25.11.2019]

This Privacy Policy on the Internet ("Policy") applies to the [ARG Training Website] located at <https://akademiarozwojugoodyear.pl> ("Website").

Goodyear Polska Sp. z o.o. Commitment to Privacy

Goodyear Polska and its affiliates respect the privacy of individuals and value the trust placed in them by Website visitors, customers, suppliers, and other parties with whom Goodyear conducts transactions. Goodyear processes personal data (as defined below) in accordance with the legal regulations applicable in the countries in which it operates. Since 25 May 2018, the General Data Protection Regulation (GDPR)[1] applies in European Union countries.

Whenever a user visits the Website, Goodyear Polska Sp. z o.o. with its registered office in Warsaw, ul. Krakowiaków 46, 02-255 Warsaw, Poland (hereinafter referred to as "Goodyear" or "we") processes their personal data (as defined below) as a data controller, i.e. the entity responsible for processing the user's personal data, deciding on the purposes and means of the data processing.

The purpose of this Policy is to inform the user and clearly explain:

- how and why Goodyear collects, processes, and stores the user's personal data;
- the role of Goodyear as the controller of the user's personal data; and
- the user's rights and Goodyear's obligations in relation to the processing of personal data.

Definitions

In this Policy, the following definitions apply:

- **"personal data"** means information about an identified or identifiable natural person[2];
- **"processing"** means any operation or set of operations performed on personal data or on sets of personal data, whether by automated or non-automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction, and the verb "to process" shall be interpreted accordingly; and
- **"processor"** means a natural or legal person who processes personal data on behalf of the controller. Processors of personal data on behalf of Goodyear may be its subsidiaries or affiliates, or external suppliers and service providers. In all such cases, Goodyear will enter into a data processing agreement with the processor, ensuring that the user's personal data is processed in accordance with the GDPR.
- **"service"** means a natural or legal person conducting business activity in the Republic of Poland in the field of tire sales and providing services related to tires, who holds a valid cooperation agreement with Goodyear.

Collection of Information

Method of Collection

When a user uses the Website, some personal data is collected directly as a result of browsing. However, some functions of the Website may require the user to voluntarily provide Goodyear with additional personal data.

Categories of Collected Personal Data

Goodyear collects the following information about users visiting the Website:

- the user's IP address;
- the user's internet service provider domain;
- the type and version of the user's browser, operating system, and platform;
- information regarding visited pages, search queries, time spent on the Website, and other statistical data;
- information regarding the user's habits and preferences.

If a user wishes to access or use certain Website features, Goodyear may also request the following additional data:

- **For Goodyear employees or associates:**
 - basic identification information (first name, last name, business email address, and telephone number).
- **For service owners and employees, and suppliers of goods and services for Goodyear:**
 - data related to training registration (service data: name, VAT ID, address; registrant's data: first name, last name, phone, email, position; participant's data: first name, last name, position);
 - accounting and financial data (VAT ID, REGON, fax number, bank name and account number, SWIFT code);
 - data obtained via contact forms (in particular, service name, first name, last name, email address, and message content);
 - other information resulting from surveys that Goodyear may conduct in connection with the user's use of the Website.

Please note that in some countries, vehicle identification data may be obtained from publicly available sources, so Goodyear may link the vehicle's registration number with identification data.

Payment processing, including payments made by debit and credit cards, is performed by an external service provider. Goodyear does not process or store the user's debit or credit card data in connection with transactions made via the Website.

Consequences of Refusing to Provide Personal Data

The user is not obligated to provide Goodyear with their personal data. However, please note that in some circumstances, refusal to provide personal data, accept cookies, or adjust browser settings may affect the user's browsing experience on the Website and prevent the use of certain features.

Therefore, when collecting personal data (e.g. through forms), Goodyear will indicate whether providing such data is mandatory (e.g. marking the relevant field with an asterisk) and what the consequences are of refusing to provide the required data.

Cookies and Similar Technologies

The Website may use cookies or web beacons. A cookie is a text file that can be saved on the user's computer, device, or system when using the Website. Cookies allow Goodyear to better serve Website visitors by offering them content tailored to their needs. These files contain information collected from the user's device and transmitted via the Website upon each subsequent visit, allowing actions and preferences to be remembered over time. The collected information does not include the user's first and last name, phone number, or email address.

Additional information about the use of cookies can be found in the Website Terms of Use.

Security

Taking into account the current state of technology, implementation costs, and the nature, scope, context, and purposes of the processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Goodyear implements appropriate precautions to protect personal data held by Goodyear against loss, misuse, and unauthorized access, disclosure, alteration, or destruction, as well as to enable responses in the event of misuse, loss, or unauthorized use of such personal data.

Data collected by Goodyear may be stored in data storage systems owned by third parties (see the "External Recipients" section below). In such cases, Goodyear requires these third parties to implement security practices and systems that ensure the security of the information.

Purposes and Legal Basis for Processing

Purposes of Processing

Goodyear and processors acting on behalf of Goodyear use the personal data provided by the user for the following purposes:

- **For Goodyear employees and associates:**
 - administration and processing of Website users' data, in particular:
 - monitoring the work of the agency handling training registrations, including verifying handling of registrations, responding to actions, questions, feedback, or inquiries received from users;
 - preparation of reports and analyses.
- **For service owners and employees, and suppliers of goods and services for Goodyear:**
 - registration on the Website, including responding to questions regarding the operation of the Website;
 - management of training sessions organized via the Website;
 - handling complaints, if submitted;
 - sending activation emails and SMS messages for participation in training sessions organized via the Website;

- measuring Website usage (preparing statistics on Website usage, engagement history in training sessions) for the purpose of analysis and to present training offers;
- marketing communication, including segmentation of services to better tailor communication and offers;
- work aimed at improving the operation of the Website;
- tax and accounting purposes.

Legal Basis for Processing

Goodyear cannot process personal data without a valid legal basis. Therefore, personal data may only be processed when:

- Goodyear has obtained the user’s prior consent to process their personal data;
- processing is necessary to perform Goodyear’s contractual obligations towards the user or to take action at the user’s request before entering into a contract;
- processing is necessary for Goodyear to comply with legal or regulatory obligations (e.g. tax or accounting obligations); or
- processing is necessary for the legitimate interests of Goodyear and does not unduly affect the interests or fundamental rights and freedoms of the user.

Please note that when Goodyear processes the user’s personal data on this basis, it always strives to balance Goodyear’s legitimate interest with the user’s privacy.

Examples of “legitimate interests” include:

- using cost-effective services (e.g. deciding to process data on certain platforms offered by external providers);
- offering products and services to current or potential customers;
- better managing and administering customer relationships and their data;
- improving the quality of services provided to customers by considering their preferences regarding the method (telephone, email, etc.) and frequency of communication;
- measuring customer interest in Goodyear products and better understanding customer responses to marketing emails, including through statistical surveys and other research and analysis of message status data (undelivered, delivered, opened);
- enabling Goodyear to offer advertisements and offers tailored to customers, which affects the effectiveness of Goodyear’s market introduction of products;
- selling all or part of Goodyear’s business or assets, or acquisition of assets by a third party, which may also include personal data;
- preventing fraud or criminal activity and the misuse of Goodyear’s products or services and ensuring the security of Goodyear’s IT systems, tools, and networks; and
- achieving corporate social responsibility objectives.

External Recipients

Goodyear may share personal data with its employees (to the extent necessary for the performance of their duties) and other companies in the Goodyear group. Other group companies will act either as separate data controllers (in which case the user will be separately informed of their data processing) or as processors acting on behalf of and at the request of the data controller.

Additionally, in pursuit of the purposes outlined above, Goodyear may share the user's personal data with external processors outside the Goodyear group, to the extent necessary to perform the tasks assigned to them by Goodyear.

External processors include, among others:

- providers of IT services, cloud services, and database services for Goodyear;
- consultants, suppliers, and service providers supporting Goodyear in organizing training sessions, service providers supporting Goodyear in storing and analyzing personal data, collecting feedback, reviews, and surveys from users, communicating with users on behalf of Goodyear, and processing and executing transactions.

The user's personal data may be disclosed to:

- any third party to whom Goodyear transfers its rights or obligations under an appropriate agreement;
- national or international supervisory, enforcement, or stock market authorities and courts, where Goodyear is obliged to do so by law or regulation or upon request from such authority; and
- government or local government authorities or other statutory or public bodies.

No information provided by users via the online tire warranty registration form available on the Website will be disclosed to third parties except as required by law.

Automated Decision-Making, Including Profiling

Users' personal data, including that of Website visitors, may be used by Goodyear for automated decision-making, including profiling. However, this will not produce any legal effects concerning users or similarly significantly affect them. This means that, based on personal data collected via the Website, certain features or tendencies—typical for people who have provided such personal data—will be automatically assigned to users. Thanks to such actions, Goodyear will be able to offer users services that are most likely to be of interest to them.

Data Transfers Abroad

Personal data transferred within or outside of Goodyear may also be processed in a country outside the European Economic Area, which includes EU Member States, Iceland, Liechtenstein, and Norway ("EEA").

When transferring users' personal data outside the EEA, prior to such transfer Goodyear will enter into an agreement with the recipient that includes standard data protection clauses adopted by the European Commission to ensure an adequate level of protection for the transferred personal data. The user may request additional information on this matter and on the safeguards in place by exercising their rights as outlined below (see the "User Rights" section).

Data Retention

Goodyear will retain the user's personal data for the duration of the contract concluded with the user and, after its termination, for the period required by tax and accounting laws.

However, if users wish to have their personal data removed from Goodyear's databases before the end of this period, they may request this as described below.

User Rights

The user has the right to access their personal data processed by Goodyear under this Policy. If the user believes that the data held by Goodyear is incorrect or incomplete, they may also request its rectification. Goodyear will promptly correct the relevant data.

The user also has the right to:

- request the deletion of their personal data;
- request the restriction of processing of their personal data;
- withdraw previously granted consent to Goodyear for processing their personal data (withdrawal of consent does not affect the lawfulness of processing performed before such withdrawal);
- object to the processing of their data for direct marketing purposes; or
- object to the processing of their personal data for other purposes where Goodyear processes the data on a legal basis other than the user's consent.

Goodyear will honor such requests, withdrawals, or objections in accordance with applicable data protection laws.

Additionally, the user has the right to data portability, i.e. to receive personal data provided to Goodyear in a structured, commonly used, and machine-readable format and the right to transmit that data to another controller, without hindrance from Goodyear and subject to the user's own confidentiality obligations.

To exercise the above rights, please send an email to Goodyear's designated Data Protection Officer at: inspektor_ochrony_danych@goodyear.com

If the user does not wish to receive emails or other correspondence from Goodyear, please change your preferences in the My Account section of the Website or send an email to: marketing@premio.eu. Goodyear will process requests to remove names from postal or email mailing lists in accordance with applicable data protection laws.

If the user has any questions or is dissatisfied with the way Goodyear processes their personal data, please contact Goodyear Polska Sp. z o.o., ul. Krakowiaków 46, 02-255 Warsaw or by email at: marketing@premio.pl. Goodyear will review the user's question or complaint and respond as soon as possible.

The user also always has the right to lodge a complaint with the competent data protection authority.

Other Websites

The Goodyear Website may contain links to non-Goodyear websites. Goodyear strives to link only to sites that maintain equally high standards and respect for privacy. However, Goodyear is not responsible for the content of non-Goodyear sites or their privacy practices.

Minors

Goodyear does not collect, use, or disclose via the Website personal data (such as name, address, and telephone number) of minors under the age of 16 without prior consent from a parent or guardian. Goodyear does not permit minors under the age of 16 to register or participate in contests or promotional campaigns conducted via the Website.

If a parent or guardian of a minor under the age of 16 finds that their child has provided personal data to Goodyear, they should contact Goodyear if they wish to have such data removed from Goodyear's database. If Goodyear becomes aware that it holds personal data of a minor under the age of 16, such data will be removed from existing files.

Additionally, before using or disclosing their personal data on the Website, minors under the age of 16 should obtain consent from a parent or guardian.

Policy Updates

Users will be notified in advance of future updates regarding the processing of personal data as described in this Policy via the Website (pop-up window or otherwise) and through other communication channels (e.g. email, if the user has provided an address).

Footnotes:

[1] 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.

[2] An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.