

## PRIVACY POLICY

### I. General Information

1. This Privacy Policy is a set of rules aimed at providing information about all aspects of the process of obtaining, processing and protecting your personal data. The policy is addressed to all users (hereinafter: “**Users**”) of the Controller's Website
2. This Policy sets out the rules governing processing of personal data by the Personal Data Controller, that is:

International Institute of Molecular and Cell Biology in Warsaw,  
4 Księcia Trojdena Street, 02-109 Warsaw,  
NIP: 5262278704, REGON: 013082798.  
e-mail address: [secretariat@iimcb.gov.pl](mailto:secretariat@iimcb.gov.pl)  
(hereinafter: “**Controller**”)

The Data Controller has appointed a Data Protection Officer - Ms. Karolina Praszek - Gołębiewska, contact possible via email address: [iod@odokancelaria.pl](mailto:iod@odokancelaria.pl)

3. This Policy may be amended and updated in the event of changes in the practices related to the processing of personal data (taking into account current case law and guidelines of the PUODO) or changes in generally applicable law. The Controller will duly inform the Website Users of changes to the Policy by posting relevant information on the Website.
4. By using the Controller's Website, the User is required to read and accept this Privacy Policy.
5. Providing the Controller with personal data is voluntary, but it is a prerequisite for using the Website.

### II. Definitions

1. **Controller** means the entity that decides how and for what purposes Personal Data is Processed. The Controller is responsible for ensuring that the processing complies with the applicable data protection laws.
2. **Personal Data** means any information relating to an identified or identifiable natural person.
3. **To Process, Processing or Processed** means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as: obtaining, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destroying.
4. **Processor** means any person or entity that Processes Personal Data on behalf of the Controller (other than an employee of the Controller).
5. **Internet website** - <https://www.iimcb.gov.pl/pl/>
6. **Fanpage of the Controller on social media websites:**
  - Facebook: <https://www.facebook.com/IIMCB.Warsaw/>
  - LinkedIn: <https://pl.linkedin.com/company/iimcb>
  - Twitter: [https://x.com/IIMCB\\_Poland](https://x.com/IIMCB_Poland)
  - YouTube: <https://www.youtube.com/channel/UCTGv1D2HHHvKZR6ciZp-eTQ>

### III. Processing of Users' Personal Data

1. The Controller may collect Users' Personal Data in particular in the following cases:
  - a. **asserting and exercising the Controller's rights, conducting legal proceedings and, among other things, enabling the use of the Website through the use of cookies, preventing fraud when using the Website, in particular the operation, maintenance, improvement and provision of all its functions, as well as the creation of statements, analyses and statistics for the internal purposes of the Controller, including in particular reporting, marketing tests, website development planning, development work, opinion tests, creation of statistical models pursuant to Art. 6 (1) (f) of the GDPR (the aforementioned legitimate interest of the Controller),**
  - b. **obtaining Users' Personal Data published on social media** (Controller's Fanpage) (e.g. obtaining information from Users' private profiles on social media, to the extent that this information is visible as public) pursuant to Article 6(1)(f) of the GDPR (*legitimate interest of the Controller - promotion of its own business, running a social media profile (Fanpage), building and strengthening relationships with customers, conducting analyses and statistics on the popularity and functioning of the profile, as well as establishing, investigating and defending against possible claims regarding the use of the profile, responding to contact*),
  - c. **obtaining or requesting Users to provide their Personal Data when Users visit the Controller's websites or use any functions or resources available on or through the Website - cookies and third-party cookies.** When Users visit the Website, their devices and browsers may automatically share certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to the Website, and other technical communications information), some of which may constitute Personal Data. During a visit to the Website, no Personal Data of Users will be stored by the Controller without appropriate legal grounds. With regard to cookies, the Controller will obtain the User's consent for the installation of all cookies (including third-party cookies from Google Analytics), except for those that are necessary. Granting of the aforementioned consent is optional and does not affect the possibility of using the Website. *Processing takes place pursuant to Article 6(1) (a) (consent - with regard to cookies other than necessary cookies) and Article 399 of the Polish Act on Electronic Communications (legal provision - with regard to necessary cookies).*
2. Provision of personal data is voluntary; it is not a statutory obligation. In certain cases, however, it is not possible to use the Website without providing personal data. Categories of Users' Personal Data Processed by the Controller may, in particular, include:
  - a. **Personal data:** first name(s), surname(s),
  - b. **Contact details:** company details, email address, telephone number.
  - c. **Message content:** all messages (inquiries, statements, views and opinions) that have been posted on the Controller's website or their Fanpages by the User.
  - d. **IP number, cookies and information about how our website is used** – when using the Website.
  - e. **Image:** when publishing opinions, leaving comments, clicking the 'Like' button on the Controller's social media website (Fanpage) (if the User has their image available in their private account on that website).

3. The Controller uses fanpage profiles on social media websites. Public data provided by social media Users can be used for the following purpose:
  - a. - to respond to private messages that are addressed to us,
  - b. - to conduct discussions in the form of comments under individual posts,
  - c. - to share our posts with people who follow our fanpage,
  - d. marketing, which involves informing about our activities and ourselves through posts that we place on our Fanpage, including sponsored posts that are displayed to a wider audience of Users,
  - e. statistical, which consists of presenting data on visibility of our posts, their reach, and the number of interactions; the data presented to us by the owners of social media websites are statistical data, but they are created on the basis of observations of behaviour on our Fanpage.
4. Currently, the Controller's Website uses redirects to the following social networks (Fanpage):
  - Facebook,
  - LinkedIn,
  - Twitter,
  - YouTube,
5. By liking a post, leaving a comment, sending a private message or subscribing to a channel, the Controller together with:
  - Meta Platforms Ireland Limited, Block J, Serpentine Avenue, Dublin 4, Ireland
  - LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.
  - Twitter International Unlimited Company, Attn: Data Protection Officer, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 IRELAND
  - Google Ireland Limited Google Building Gordon House, 4 Barrow St, Grand Canal Dock, Dublin 4, D04 V4X7, Irelandbecomes the Controller of your personal data shared on their Fanpage for data processing for statistical and advertising purposes.
6. Therefore, we encourage you to read their privacy policy:
  - Facebook - [https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0)
  - LinkedIn - <https://pl.linkedin.com/legal/privacy-policy>
  - Serwis X - <https://twitter.com/pl/privacy#x-privacy-9.1>
  - Youtube - <https://policies.google.com/privacy?hl=pl>

#### IV. Sharing Personal Data with third parties

1. The Controller may share Users' Personal Data:
  - a. with entities entrusted with data processing e.g. technical service providers or consultancy service providers,
  - b. other controllers, if required by law or in good faith, that such action is necessary to comply with applicable law, in particular in response to a request from a court or state authority.
2. If we engage a third party to Process Users' Personal Data, in accordance with the processing entrustment agreement concluded with such entity, the Processor will be obliged to:
  - a. Process only the Personal Data indicated in the Controller's prior written instructions; and

- b. apply all measures to protect confidentiality and security of Personal Data and ensure compliance with all other requirements of generally applicable law.
3. Due to the use of Facebook, LinkedIn, YouTube services, data may be transferred by these entities to third countries - the United States of America (USA) in connection with making them available internally, among others, to Meta Platforms Inc., LinkedIn Corporation, X Corp., Google LLC, over which the Controller has no influence.

## **V. Third-party services**

1. The website may contain functions or links that redirect to websites and services provided by third parties that are not managed by us. The information you provide on these websites or services will be subject to their own privacy policies and data processing procedures.
2. The Controller is not responsible for processing procedures of independent website Administrators and service providers.
3. We encourage you to review the privacy and security policies of third parties before submitting information to them.

## **VI. Data Protection**

1. The Controller informs that it has implemented appropriate technical and organisational measures to protect Personal Data, in particular including safeguards against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access and other unlawful and unauthorised forms of Processing, in accordance with applicable law.
2. The Controller is not liable for the actions or omissions of Users. Users are responsible for ensuring that all personal data is sent to the Controller in a secure manner.
3. Personal data will not be subject to automated profiling, i.e. automated decision-making towards the User, namely decisions made by technical means without human intervention, producing legal effects concerning the profiled person or otherwise significantly affecting the profiled person.

## **VII. Data Accuracy**

1. The Controller shall take all reasonable steps to ensure that:
  - a. The Personal Data of Users that the Controller processes are accurate and, where necessary, kept up to date;
  - b. all Personal Data of Users that the Controller Processes which is erroneous (considering the purpose for which it is Processed) will be deleted or corrected without undue delay.
2. The Controller may, at any time, ask Users about the accuracy of the Personal Data being Processed.

## **VIII. Data scope minimization**

The Controller takes all appropriate measures to ensure that the scope of the Users' Personal Data that it processes is limited to Personal Data that are adequately required for the purposes set out in this Policy.

## IX. International Transfer of Data

Personal data may be shared and processed outside the European Economic Area (the European Economic Area consists of: the European Union and Iceland, Liechtenstein and Norway, together “EEA”). If personal data is transferred outside the EEA, the Controller requires appropriate safeguards. The Controller will fulfil its obligations under Chapter V of the GDPR to ensure the lawfulness of such processing.

## X. Personal Data Retention Period

1. The criteria determining the length of time during which the Controller stores Users' Personal Data are as follows: The Controller shall store Users' Personal Data in a form that allows for identification only for as long as it is necessary to achieve the purposes indicated in this Policy, unless generally applicable laws require a longer period of storage of Personal Data. The Controller may, in particular, store Users' Personal Data for the entire period necessary to establish, exercise or defend claims (statute of limitations in accordance with Article 118 of the Polish Civil Code).
2. Personal data is stored:
  - a. for the Controller's internal purposes, where the legal grounds for processing is the legitimate interest of the Controller, personal data will be stored until the Controller's legitimate interests which form the basis for data processing have been fulfilled or until an objection has been raised against such processing, after the Controller has properly analysed the User's interest and the grounds for the Controller's processing;
  - b. in the case of data processed on our Fanpage, until you unsubscribe from further viewing/commenting on our Fanpage, e.g. by clicking “dislike”, undoing the like of a post or deleting a comment on a post, or cancelling your subscription.

## XI. Google Analytics

1. The Controller uses the **Google Analytics** tool provided by Google LLC, whose infrastructure is located at Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Controller indicates that Google LLC (1600 Amphitheatre Parkway, Mountain View, California 94043, USA) has acceded to the EU-US Data Privacy Framework Agreement, i.e. it ensures an adequate level of security for the processing of personal data in accordance with the GDPR.
2. Google Analytics allows for:
  - a) **Tracking website traffic:** information about the number of users, the number of visits, the sources of traffic (e.g. advertising, search engines, social media).
  - b) **Monitoring user behaviour:** analysis of which pages are visited most frequently, time spent on the website, bounce rate.
  - c) **User segmentation:** demographic, geographic and technological data (e.g. device type, browser).
  - d) **Goal and conversion tracking:** analysing how users perform specific actions such as purchases, newsletter subscriptions or downloads.
3. Google Analytics processes data that may include:
  - a) **IP addresses:** used to identify the geographical location of users, which, in combination with other data, may constitute personal data.

- b) **Cookies:** storing unique user and session identifiers, enabling tracking of their activity, only after the User has given appropriate consent
  - c) **Technical data:** e.g. browser type, operating system, screen resolution, internet service provider.
- 4. The Controller uses the IP address anonymisation function, which excludes the possibility of identifying Users (the last octet of the IP address is masked before storing or processing data).
- 5. The Controller processes data using the indicated tool in order to provide analyses and reports on website traffic and the effectiveness of marketing activities based on the legitimate interest of the controller and the consent of the user (acceptance of Google Analytics cookies). The Controller has entered into a relevant data processing entrustment agreement with Google (Data Processing Agreement), regulating the issue of data security in a manner required by law.
- 6. The storage period of the collected data if Google Analytics cookies are accepted lasts 14 months.
- 7. We encourage you to read Google's Privacy Policy, which can be found at: <https://policies.google.com/privacy?hl=pl>
- 8. Users can configure their browser to block cookies related to Google Analytics. Google Analytics uses cookies such as `_ga`, `_gid` and `_gat`.
- 9. Users can also use a Google Analytics blocking plugin. Google offers a browser add-on to block Google Analytics, which can be downloaded from the official website: <https://tools.google.com/dlpage/gaoptout>. Once installed, the plugin will prevent data from being sent to Google Analytics from all visited websites.

## XII. Mouseflow

- 1. The Website Administrator uses the Mouseflow service, a dedicated tool for analyzing User behavior, which records video of each session (i.e. User movement on the Website) and creates heat maps enabling detailed analysis and optimization of the website, recording, for example, mouse movements, clicks and interactions on the Website. Mouseflow is a tool that optimizes the functionality of the Website and adapts it to the needs of Users.
- 2. Using the Mouseflow tool, the Administrator may collect the following information about Users: cursor movements, clicks and scrolling of the page, time spent on individual subpages, information about the device and browser (e.g. operating system, screen resolution, browser type), anonymous IP address (it is masked before it is saved), data about the source of entry to the website.
- 3. Data collected using Mouseflow are used to: Improve the functionality and ergonomics of the website, analyze how Users use the Website, optimize the content and layout of the page.
- 4. Users can block Mouseflow using the following options: Setting the browser to block Mouseflow cookies
- 5. Using the tool available on the Site and blocking cookies associated with that tool.
- 6. We encourage you to read Mouseflow's Privacy Policy at <https://mouseflow.com/legal/privacy-policy/>
- 7. Data collected by Mouseflow is stored for the period necessary to analyze and optimize the Website, but no longer than 12 months.

## XIII. User Rights

- 1. You have the following rights in relation to processing of personal data:

- a. **the right to access processed personal data** – on this basis, at the request of the data subject, the Controller provides information on the processing of personal data concerning them, including, above all, the purposes and legal grounds for the processing, the scope of the data held, the entities to which the personal data are disclosed, and the planned date of their erasure. Within the scope of the right to access data, the data subject may also request information about who their personal data is shared with and whether it is subject to profiling and automated decision-making. The data subject also has the right to obtain a copy of their data.
  - b. **the right to rectify data** – on this basis, the Controller, at the request of the data subject, removes any discrepancies or errors concerning the processed personal data, and supplements or updates them if they are incomplete or have changed;
  - c. **the right to data erasure** – on this basis, the Controller, at the request of the data subject, deletes data which processing is no longer necessary to achieve any of the purposes for which they were collected, the consent to their processing has been withdrawn or an objection has been made and it is not required for the establishment, exercise or defence of the Controller's claims;
  - d. **the right to restrict and transfer processing** – on this basis, the Controller, at the request of the data subject, shall cease to carry out operations on such personal data, to the extent permitted by law, and shall issue such personal data in a format that can be read by a computer;
  - e. **the right to lodge a complaint** – by exercising this right, a person who believes that their personal data is being processed in violation of applicable law may lodge a complaint with the President of the Personal Data Protection Office (2 Stawki Street, 00-193 Warsaw);
  - f. **the right to object** – the data subject may, at any time, object to the processing of personal data for the purposes for which it was collected and is being processed;
  - g. **the right to withdraw consent** – if we process personal data on the basis of a consent given, the data subject may withdraw this consent at any time. Withdrawal of the consent does not make the processing of personal data illegal up to that point; the withdrawal of consent does not affect the lawfulness of the processing to date, but it will result in the personal data no longer being used for those purposes from the moment the consent is withdrawn.
2. A request to exercise the rights described above can be submitted by post to the address of the Controller's registered office or by email to: [iod@odokancelaria.pl](mailto:iod@odokancelaria.pl)
  3. Where possible, the request should clearly specify the subject of the request, i.e. in particular the addressee of the request and the right of the person submitting the request to exercise the above-described right. If the Controller is unable to determine the content of the request or identify the person making the request based on the notification, they will ask the requester for additional information.

#### XIV. Cookie files (cookies)

1. When you use the Website, the data about the User are collected automatically. This data may include:
  - a. IP address,
  - b. domain name,

- c. browser type,
  - d. operating system type.
- 2. This data can be collected by:
  - a. cookies,
  - b. Google Analytics system
  - c. and can be stored in server logs.
- 3. Cookies are small text files that are stored by your browser on your computer's hard drive or on your smartphone's memory card. During subsequent visits to the website, the information stored in the cookie file is sent back to the website. This enables the website to recognise you and to customise the content for you.
- 4. We may use cookies to improve our website, deliver the most relevant content, and analyse how our Users use our Website.
- 5. We may process the data contained in the cookies for the following purposes:
  - a. personalising the Website: remembering information about you so that you do not have to re-enter this information during subsequent visits;
  - b. providing you with customised advertisements, content and information;
  - c. monitoring aggregate site usage metrics such as total number of visitors and pages viewed.
- 6. We use the following types of files:
  - a. session cookies, which are temporary files and are stored on the Website visitor's device until they leave the Website;
  - b. permanent cookies, which are stored on the Website visitor's device for the time specified in the cookie parameters or until they are manually deleted;
- 7. We can divide cookies into the following file categories:
  - a. essential cookies: Essential cookies contribute to the usability of a website by enabling basic functions such as website navigation and access to secure areas of the website. The website cannot function properly without these cookies.
  - b. marketing cookies: Marketing cookies are used to track users on websites. The aim is to display advertisements that are relevant and interesting for individual users and therefore more valuable for publishers and third-party advertisers (checkbox to be ticked).
  - c. unclassified cookies: Unclassified cookies are cookies that are in the process of being classified, together with the providers of individual cookies
- 8. We use analytics and similar services that contain third-party cookies. When using the website, third-party cookies may be used to enable the use of the functionality of the website and the websites integrated into it or to analyse the effectiveness of advertising campaigns and to collect anonymous information about the use of the website for statistical purposes.
- 9. This Privacy Policy does not regulate the use of third-party cookies. Each third party determines their own cookie usage rules in their privacy policy.
- 10. The Website uses the Google Analytics tool. Please note that you can prevent Google from collecting the data generated by the cookie and related to your use of the website (including your IP address), as well as the processing of this data by Google, by installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout>
- 11. You can also change the way cookies are used by using the cookie management tool provided.
- 12. Please note that not consenting to, deleting, blocking or restricting the placement of cookies may cause difficulties or even prevent the use of the Website.