Szkoła Językowa Esperanza Anna Kwiatkowska ul. Kilińskiego 32B, 07-410 Ostrołęka | tel. 600-191-380 | esperanza.biuro@gmail.com

PRIVACY POLICY

Scope of Data Processing, Legal Bases, Data Recipients, Retention Period, Data Subject Rights Version of 2025-09-01

§ 1. Personal Data Controller

The controller of your personal data is Szkoła Językowa Esperanza Anna Kwiatkowska with its registered office at ul. Kilińskiego 32B, 07-410 Ostrołęka, NIP: 758-173-28-94, e-mail: esperanza.biuro@gmail.com, tel. 600-191-380.

§ 2. Scope of Processed Data

We process the following categories of personal data:

- identification data: first name, last name, PESEL, date of birth,
- contact data: residential address, phone number, e-mail address,
- contract-related data: contract number, chosen course, payment history,
- image data (only with separate, voluntary consent): photos and recordings from classes,
- data processed in the Langlion electronic register.

§ 3. Purposes and Legal Bases of Processing

Personal data is processed for the following purposes:

- performance of an agreement for the provision of educational services (Art. 6 sec. 1 lit. b GDPR),
- fulfillment of legal obligations, including tax and accounting obligations (Art. 6 sec. 1 lit. c

GDPR),

- establishment, exercise or defense of legal claims – legitimate interest of the Controller (Art. 6 sec.

1 lit. f GDPR),

- marketing of own services – legitimate interest of the Controller or consent (Art. 6

sec. 1 lit. a or f GDPR),

- publication of image – solely based on voluntary, separate consent (Art. 6 sec. 1 lit.

a GDPR).

§ 4. Data Recipients

Your data may be transferred to:

- processors acting on behalf of the Controller (accounting office, Langlion system provider,

website hosting),

- public authorities, if the obligation to transfer results from legal provisions.

We do not sell personal data to third parties.

§ 5. Data Retention Period

Data is retained for:

- the duration of the agreement + 5 years from its termination (for tax purposes and potential

claims),

- 10 years – accounting documents (in accordance with tax regulations),
- until consent is withdrawn or an effective objection is raised – marketing and

image data.

§ 6. Data Subject Rights

You have the following rights:

- right of access to data (Art. 15 GDPR),
- right to rectification of data (Art. 16 GDPR),
- right to erasure of data - right to be forgotten (Art. 17 GDPR),
- right to restriction of processing (Art. 18 GDPR),
- right to data portability (Art. 20 GDPR),
- right to object (Art. 21 GDPR),
- right to withdraw consent at any time (without affecting the lawfulness of

processing before withdrawal),

- right to lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, 00-

193 Warsaw).

§ 7. Transfer of Data to Third Countries

As a rule, data is not transferred outside the European Economic Area. In case of using global tools (e.g., Google Workspace), the transfer takes place based on standard contractual clauses or other mechanisms compliant with GDPR.

§ 8. Automated Decision-Making

We do not use automated decision-making or profiling as defined in Art. 22

GDPR.

§ 9. Contact for Data Protection Matters

For matters concerning personal data protection, you can contact the Controller:

- e-mail: esperanza.biuro@gmail.com
- tel.: 600-191-380
- by post: ul. Kilińskiego 32B, 07-410 Ostrołęka

§ 10. Final Provisions

This privacy policy may be updated. We will inform about any significant changes via the website esperanza.edu.pl or directly to participants. This policy is effective as of September 1, 2024.