



GDPR INFORMATION CLAUSE

for

Katrin Beata Śliwińska Flaumenhaft Scandinavian Method Metoda Skandynawska,
the website <http://scandinavian-method.com/>
and social networking on Facebook, Instagram, YouTube channel

1. Legal basis for the processing of personal data

Katrin Beata Śliwińska Flaumenhaft Scandinavian Method Metoda Skandynawska (hereinafter „Scandinavian Method” or „Data Controller”), which:

1. provides language learning services,
2. is the owner of the website www.scandinavian-method.com (hereinafter: „Website”),
3. is the administrator of own social profiles

provides privacy protection at the level, which corresponds to the standards set by the applicable legislation, such as:

1. the protection of personal data - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: 'GDPR'),
2. provision of services by electronic means - Act of 18 July 2002 on provision of services by electronic means,

2. The Data Controller

The Data Controller of your personal data is: Katrin Beata Śliwińska Flaumenhaft Scandinavian Method Metoda Skandynawska, 17/22 Czechowicka Street, 04-218 Warsaw, NIP 6792988414, REGON 120436486, phone: 690 009 896, e-mail: info@metodskandynawska.pl.

3. The Data Protection Officer, contact to the Data Controller and to the Office for Personal Data Protection

The Data Controller has not appointed a Data Protection Officer, but you can address any doubts, objections, complaints or suspicions of a breach of the processing of your personal data:

1. directly to the Data Controller by e-mail to the following address: info@metodskandynawska.pl or by post to the address: Katrin Beata Śliwińska Flaumenhaft Scandinavian Method Metoda Skandynawska, ul. Czechowicka 17/22, 04-218 Warszawa (17/22 Czechowicka Street, 04-218 Warsaw) and/or
2. to the President of the Office for Personal Data Protection by e-mail to the following address: kancelaria@uodo.gov.pl or by post to the address: Office for Personal Data Protection, ul. Stawki 2, 00-193 Warszawa (2 Stawki Street, 00-193 Warsaw).

4. Source of data collected

Your personal data is collected in two ways:

1. as information, which you directly give us:
 - a. when you use the language learning services,
 - b. when you write something to us using the contact form, available on our Website,
 - c. when you visit our social media profiles, including posting „likes”, commenting etc.,
 - d. when we exchange correspondence via e-mail and instant messaging and telephone calls,
2. as information, which we get, when you use services available in the Website, such as:
 - a. method of using the services,
 - b. Internet protocol used, IP address,



c. data on the operation of the device which you are using, including: about failures, system activity, hardware settings, browser type and language, dates and times of requests and URLs, cookies.

5. Data processed in connection with the provision of services

1. Language learning

When the Scandinavian Method® provides language learning services for you, it collects and processes your basic personal data, such as: e.g. name, surname, your address, your telephone number, your email address, Skype ID

2. By electronic means

When the Scandinavian Method® provides services by electronic means for you, e.g.:

- a. presenting information and commercial information,
- b. Internet communication services, e.g. through a contact form,
- c. supporting the presence of the Scandinavian Method® in the Internet,
- d. providing images

it collects and processes your basic personal data, such as: e.g. name, surname, your address, your telephone number, your e-mail address, identification data (e.g. IP of the device), other data derived from "cookie" files.

You can enter data from point 1) and 2) voluntarily, but if you do not do that, probably it will not be possible to fulfill the purpose of processing the personal data and/or to provide the service.

6. Purposes and legal basis for personal data processing

The Scandinavian Method®

processes your personal data for the following purposes:

1. to perform a contract of language learning services (Article 6(1)(b) GDPR)
2. to perform a contract of services by electronic means (Article 6(1)(b) GDPR)
3. to fulfil the Scandinavian Method®'s legal obligations (Article 6(1)(c) GDPR), such as:
 - a. data processing for tax and accounting purposes,
 - b. ensure accountability of personal data protection,
4. to pursue the legitimate interests of the Scandinavian Method® (Article 6(1)(f) GDPR), such as:
 - a. direct marketing of the services provided by the Scandinavian Method®, including contacting you for permitted marketing activities by e-mail and/or telephone,
 - b. monitoring your activity, resulting from the Scandinavian Method®'s Cookie Policy,
 - c. ensuring the security of services that are provided by the Scandinavian Method® under the concluded contracts for the provision of services by electronic means, e.g. enforcing compliance to the terms and conditions of the Website, preventing any abuse and ensuring the security of traffic in the Website,
 - d. satisfaction surveys, e.g. on your satisfaction with the results of language learning based on the contract,
 - e. surveys and analyses of the Website traffic, in terms of e.g. its functioning, possible areas of improvement, or identification of visitors' needs,
 - f. handling your requests, suggestions made by e-mail, telephone or by the contact form when they are not related to the performance of the contract between the Scandinavian Method® and you,
 - g. conducting statistical analyses, including receiving the 'Site Statistics' of the Scandinavian Method® Fanpage, conducted by Facebook to provide the Scandinavian Method® with information on the coverage and interaction rates of the site,



h. storing data for archiving purposes.

7. Accessing and modifying personal data

When you give us your personal data, you have the right – within the scope of the applicable regulations, to:

1. get the access to processed personal data,
2. receive information on the personal data being processed,
3. rectification of your personal data if you notice that the data is incorrect or incomplete,
4. supplementation of incomplete personal data (taking into account the purposes of processing)
5. deleting the personal data concerning you,
6. restricting the processing of personal data,
7. object to the processing of data that is processed on the basis of the legitimate interest of the Scandinavian Method® (Article 6(1)(f) GDPR),
8. transfer the data if their processing is based on consent or a contract concluded and to receive from the Scandinavian Method® personal data supplied to it in a structured format for the purpose of transfer to another data controller (transfer of data to another entity),
9. withdraw consent at any time if the processing is based on your consent (Article 6(1)(a) GDPR),
10. withdraw consent to the processing of personal data with effect for the future with regard to the processing of this data which is processed in connection to the collection of data from websites and mobile applications ('cookies'); for this purpose, you must make changes to the configuration of your web browser or the website or service selected.

8. Profiling and automated decision making

When the Scandinavian Method® provides language learning services and services by electronic means, it may carry out profiling, i.e. automated processing of the personal data you have provided in order to request your characteristics.

1. Profiling in the framework of providing language learning services is used when it is necessary to perform certain language learning services for you.
2. Profiling on the Website and in social media is used when it is necessary to perform certain services on your behalf and to increase your convenience in using the Website and improve the quality of services offered.

However, the Scandinavian Method® does not make any automated profiling-based decision against you, which could produce any legal effects or similarly significantly affect the scope of your rights and obligations. Any such decision can only be made by the owner or employee of the Scandinavian Method® after a detailed analysis of all information and arguments that may be important to the decision.

9. Social Media

1. Facebook/Instagram

The Scandinavian Method® has an official fanpage on the Facebook: *Scandinavian Method: FUN WAY to LEARN English from TV* and on the Instagram: *scandinavian.method_learn.eng*

. That fanpage is technically delivered by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. Facebook uses a „Site Statistics” tool to give the Scandinavian Method® information about the coverage and interaction rates of the fanpage. Details about „Site Statistics” tool you can find here:

https://www.facebook.com/legal/terms/information_about_page_insights_data.

The Scandinavian Method® and the Facebook have shared responsibility for everything, which Scandinavian Method® profile includes on Facebook/Instagram. In accordance with Article 26, the Scandinavian Method® and Facebook have an agreement



called „joint control”. Details of this agreement are available here: https://www.facebook.com/legal/terms/page_controller_addendum.

This agreement follows the judgment of the European Court of Justice of 5 June 2018. (C-210/16).

Your personal data is processed by the "Site Statistics" tool even if you do not have a Facebook/Instagram profile. Data is already collected when you visit the Scandinavian Method®'s profile and in connection with your reaction, e.g. liking the profile or leaving a comment. The legal basis for the processing of your personal data by the „Site Statistics” tool is Article 6(1)(f) GDPR.

In accordance with the above mentioned agreement, the authority responsible for and supervising your complaints, which are related to Scandinavian Method®'s profile is the Irish Data Protection Commission.

2. YouTube channel

The Scandinavian Method has a channel on YouTube, which is called *METODA SKANDYNAWSKA: ANGIELSKI z SERIALI & FILMÓW*. This channel includes videos on language learning using the Scandinavian Method®. When you watch the Scandinavian Method's films, YouTube and Google process your personal data regardless, if you are a logged-in user of YouTube/Google or not.

YouTube keeps your personal data like a user's profile and uses it for advertising, market research and user-friendly configuration of its website. The analysis/evaluation of users (both logged in and not logged in) and their actions on the YouTube website is aimed, among other things, at personalizing the user-driven advertising on YouTube. For detailed information on the purpose and scope of data processing by YouTube, please refer to the data protection statement, which also includes information on your rights and privacy settings: <https://policies.google.com/privacy?hl=pl>.

Google also processes your personal data in the United States in accordance with EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

The Scandinavian Method® has no impact on the purpose, scope and method of processing by Google/YouTube of personal data of users watching the videos it contains.

10. Sharing and transfer of data to third parties

1. Personal data, which is processed in connection with the provision of the language learning service, the Scandinavian Method can entrust or, with your consent, make available to other third parties. It is done for the purpose of performing the contracts concluded or fulfilling the obligations imposed on the Scandinavian Method® by other legal regulations (e.g. accounting and tax regulations),
2. Personal data, which is processed in connection with the provision of services by electronic means, the Scandinavian Method® can entrust or, with your consent, make available to other parties involved in the provision of electronic services to you, e.g. Internet service providers, telecommunications companies, etc.

The Scandinavian Method® does not transfer personal data outside the country, outside the European Economic Area or to international organisations.

11. Retention period of personal data

Your personal data is stored by the Scandinavian Method® for the duration of contracts between you and the Scandinavian Method®, including language learning and/or electronic service contracts, and after their termination for the following purposes:

1. to pursue claims in connection with the performance of the contract,
2. to fulfil the obligations arising from the law,



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3. to prevent abuse and fraud,
 4. statistical and archiving,
– for a maximum of 5 years from the end of the year in which the contract is terminated.