



I. General information

1. This Cookies Policy contains information on the use of cookies and other similar technologies designed to collect information about user activity on SATEL website: “**BE WAVE Service**” located at the internet address: bewave.systems along with all pages operating within this domain (hereinafter: the **Service**).

2. Definitions:

- ▶ **Cookies** – small files that are saved and stored on a user’s terminal device (e.g. on a computer or smartphone) when they visit websites on the internet, and other similar technologies used to collect information about user activity on websites;
- ▶ **Policy** – this Cookies Policy;
- ▶ **Privacy Policy** – SATEL Privacy Policy available at www.satel.pl;
- ▶ **Terms of Service and Conditions** – BE WAVE Website Terms and Conditions available on the website: bewave.systems/en/terms-and-conditions/
- ▶ **GDPR** – 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 (General Data Protection Regulation).
- ▶ **SATEL** – SATEL sp. z o.o. with its registered office at ul. Budowlanych 66 in Gdańsk (postcode 80-298), registered in the register of entrepreneurs kept by the District Court Gdańsk-Północ in Gdańsk, 7th Commercial Division of the National Court Register under the number KRS 0000178400, NIP: 5840154038, REGON: 19297638000000, with the share capital of PLN 1,830,000 (fully paid up), BDO register number: 000006416 which has appointed a Personal Data Protection Officer (iodo@satel.pl, tel. 58 320 94 27, ext. 377);
- ▶ **Website** – the web pages operating within the Service.

3. This Policy is intended for information purposes. Further information regarding the processing of personal data by SATEL is available in the **Privacy Policy** and **Terms of Service and Conditions**.

4. SATEL may amend this Policy by publishing a new Policy, in particular in the event of changes to the scope of Cookies used or changes to the legislation in force.

II. Cookies

1. Information on the types of Cookies used on the Websites can be found in the box where the user can choose the cookies to be accepted, which is displayed on the Website the first time the user visits it.

2. Types of Cookies:

- **Necessary Cookies** – which do not require the user’s consent (used on the basis of the Telecommunications Law – Article 173(3)); necessary for the operation of the Website, providing the user with access to the Website and its basic functions;
- **Optional Cookies** – used with the user’s consent (after selecting relevant options in the Cookies box):
 - ▶ relating to preferences – they make it possible to remember information that changes the appearance or operation of the Website, such as the preferred language or the region in which the user is located;
 - ▶ statistical Cookies – they help to understand how different users behave on the Website by collecting and reporting anonymous information;
 - ▶ marketing Cookies – these are used to track users on websites in order to display SATEL or third-party advertisements tailored to users’ interests and needs.

3. Cookies are safe for the user's device with which they use the Websites.
4. Cookies may originate from SATEL or third parties specified in the Cookie List. Third parties may combine the information from the Cookies with other data received from the user or obtained when using the services of such third parties, in accordance with their privacy policies. SATEL uses third-party Cookies for statistical (analytical) and marketing purposes as described in point. IV of the Policy.
5. Detailed information on the Cookies used, their providers (third parties) and the storage duration is available in the **Cookie List**.

III. Cookie management

1. At any time, the user can in the Cookies panel available on the Website under the "cookies" icon:
 - withdraw their consent to the use of Cookies on the Website;
 - change their Cookie settings.
2. The Cookies Panel:
 - contains detailed information about the Cookies used on the Website and about third parties;
 - allows giving and withdrawing consent to the use of optional Cookies;
 - allows changing previously selected settings.
3. At any time, the user can delete Cookies and change their Cookie settings (e.g. block certain Cookies) also using their internet browser settings. Detailed information about the possibility and management of Cookies is available in the settings of the selected internet browser, for example:

➤ **Chrome**

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=pl&hl=en&sjid=6582591369461490147-EU>

➤ **Internet Explorer**

<https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc>

➤ **Safari**

<https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>

➤ **Opera**

<https://help.opera.com/en/latest/web-preferences/>

➤ **Microsoft Edge**

<https://support.microsoft.com/en-us/microsoft-edge/view-and-delete-browser-history-in-microsoft-edge-00cf7943-a9e1-975a-a33d-ac10ce454ca4>

➤ **Firefox**

<https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

4. In the case of Cookies that are necessary for the operation of the Site, changing the settings of the browser may cause some services not to function properly or even prevent the use of the Website altogether.

IV. Third-party Cookies

By using Cookies, as part of profiling, the user's activity is analysed in order to improve the quality of the products and services offered, including optimising the functionality of the Website, as well as presenting the user with advertisements for products or services in which they may be interested. This does not significantly affect the user's decisions, nor is it intended to have any legal consequences for the user. The legal basis for profiling is **Article 6(1)(f) of the GDPR**, i.e. the legitimate interest of the controller or a third party. As part of statistical (analytical) and marketing activities for the purpose of displaying advertisements tailored to users, the Websites use Cookies from Google Ireland Ltd. based in Ireland and Google LLC. with its registered office in the USA.

Further information regarding the specified Cookies is available in the Google Privacy Policy:

- <https://policies.google.com/privacy?gl=pl&hl=en>
- https://support.google.com/analytics/topic/2919631?hl=en&%3Bamp%3Bref_topic&sjid=6586010059554128367-EU
- <https://consent.google.com/d?continue=https%3A%2F%2Fadssettings.google.com%2Fanonymous%3Fhl%3Dpl&gl=PL&m=0&pc=ads&hl=en-GB&src=4&oldhl>

V. Personal data

1. As a rule, the information obtained using Cookies does not constitute personal data, and in particular it is not combined by SATEL with other user data, nor is it used by SATEL to identify users. However, certain information may be linked to a specific person, e.g. by linking such information to other data held by third parties, and as such may be considered personal data. For information collected with Cookies that can be linked to a specific person, provisions of the **Privacy Policy** are applicable.
2. The legal basis for the processing is the legitimate interest of the controller or a third party (*Article 6(1)(f) of the GDPR*), i.e. improving the quality of the products and services offered, and marketing the products and services of the controller or a third party.
3. The data subject has the right to object at any time to the processing of personal data concerning him or her for the purposes of the legitimate interest of the Controller or a third party, including profiling.
4. If personal data of users is obtained using Cookies, the deletion of Cookies by the user does not imply the deletion of this data by the data controller.
5. As part of the use of third-party Cookies, personal data may be transferred to third states (states outside the European Economic Area) on the basis of standard contractual clauses. If this is the case, a copy of the security information can be obtained from the SATEL Data Protection Officer (contact details are provided in Section I of the Policy).