

## Privacy policy

Good morning!

If you're here, it's a sure sign that you value your privacy. We understand this very well, which is why we provide you with a document in which you will find in one place the rules for the processing of personal data and the use of cookies and other tracking technologies in connection with the functioning of the websites:

- ChessStars.pl
- ChessStars.net
- ChessStars.eu
- ChessStars.app
- PolishChessTour.pl
- PolishChessTour.eu,

here and after referred to as the "website", "websites", "services", „service”.

Formal information at the beginning – the administrator of the website is Paweł Kabat, running a business, NIP: 6070032215, 47/2 Praska Street, 30-329 Kraków.

This privacy policy is structured in the form of questions and answers. The choice of this form was dictated by the care for the clarity and legibility of the information presented to you. Below you will find a table of contents of this policy corresponding to the questions we answer one by one.

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If you have any doubts about this privacy policy, you can contact us at any time by sending a message to [kontakt@chessstars.pl](mailto:kontakt@chessstars.pl)

## **#1: Who is the controller of your personal data?**

The administrator of your personal data is Paweł Kabat, conducting business activity, NIP: 6070032215, 47/2 Praska Street, 30-329 Kraków.

## **#2: Who can you contact about the processing of your personal data?**

As part of the implementation of personal data protection in our organization, we have decided not to appoint a personal data protection officer due to the fact that it is not mandatory in our situation. In matters related to the protection of personal data and broadly understood privacy, you can contact us at the e-mail address [kontakt@chessstars.pl](mailto:kontakt@chessstars.pl)

## **#3: What Information Do We Have About You?**

Depending on the purpose, we may process the following information about you:

- name and surname,
- Address
- E-mail address
- telephone number
- data contained in correspondence addressed to us,
- details of orders placed,
- bank account number,
- IP address,
- activity in relation to the newsletters sent.

We have described the scope of the processed data precisely in relation to each purpose of processing. Information in this regard can be found further in this policy.

## **§ 4: Where do we get your personal data from?**

In most cases, you provide it to us yourself. This happens when:

- register a user account,
- you place an order on the website,
- you receive a prize or a gift,
- you send a complaint or withdraw from the contract,
- subscribe to the newsletter,

- Add a comment or review
- You contact us.

In addition, some information about you may be automatically collected by the tools we use:

- the mechanism of the website and the newsletter system collect your IP address,
- The mechanism of the newsletter system collects information about your activity in relation to the content sent to you as part of the newsletter, such as opening emails, clicking on links, etc.

## **#5: Is Your Data Safe?**

We care about the security of your personal data. We have analysed the risks associated with the various processes of processing your data and then implemented appropriate security and personal data protection measures. We monitor the condition of our technical infrastructure on an ongoing basis, train our staff, review the procedures used, and make necessary improvements. If you have any questions about your personal data, we are at your disposal at kontakt@chessstars.pl.

## **#6: For what purposes do we process your personal data?**

There is more than one of these goals. Below is a list of them, followed by a more detailed discussion. We have also assigned the respective legal bases for processing to the individual purposes.

- registration and maintenance of a user account – Article 6(1)(b) of the GDPR,
- handling the order, handling the issuance of prizes and gifts – Article 6(1)(b) of the GDPR,
- handling complaints or withdrawal from a contract – Article 6(1)(f) of the GDPR,
- sending the newsletter – Article 6(1)(a) of the GDPR,
- handling comments or opinions – Article 6(1)(a) of the GDPR,
- handling correspondence – Article 6(1)(f) of the GDPR,
- fulfilment of tax and accounting obligations – Article 6(1)(c) of the GDPR,
- creating an archive for the purposes of a possible need to defend, establish or pursue claims, as well as to identify a returning customer – Article 6(1)(f) of the GDPR,
- own marketing – Article 6(1)(f) of the GDPR.

### **User Account Details**

When creating a user account, you need to provide the data necessary to create an account: an e-mail address and a password. Providing data is voluntary, but necessary to create an account.

As part of editing your account data, you can provide your more far-reaching data, in particular data that can be used when placing orders, such as your name and surname, address, phone number. As part of editing your account details, you can also set your avatar, such as a profile picture that includes your image.

If you create an account through integration with a social media account, we will gain access to certain data collected as part of your social network account (name, email address, profile picture) based on your prior authorization.

In addition, our system used to handle user accounts records your IP address, which you used to register a user account.

You can modify the information you have provided to us in connection with the registration of your user account at any time. However, if you have created an account using the integration with a social media account, the data downloaded from this social network cannot be modified.

The data provided by you in connection with the creation of an account are processed in order to provide you with an electronic service consisting in providing you with the possibility of using your user account. This service is provided on the basis of an agreement concluded on the terms described in the terms and conditions, which means that in this respect the legal basis for the processing of your personal data is Article 6(1)(b) of the GDPR.

The data will be stored for the duration of the user's account. You can decide to delete your account at any time, but this will not remove information about your orders placed using your account from our database. Order data is stored in our archive for the entire period of the website's operation in order to ensure the possibility of identifying the returning customer, reconstructing their purchase history, discounts granted, etc., which is our legitimate interest referred to in Article 6(1)(f) of the GDPR.

### **Orders – details**

When placing an order on the website, you must provide the data necessary to process the order. Depending on the details of the order, the data catalog may be different. For example, if you order physical products, we need to know the address where we can deliver your order. If you ask for a VAT invoice for a company, we need to know the tax identification number and the address of the business. Providing data is voluntary, but necessary to place an order.

In addition, our system used to handle the order process saves your IP address that you used to place your order.

Each order is saved in our database, which means that your personal data assigned to the order is also accompanied by information about the order, such as the ordered products, the selected payment method, the selected delivery method, the payment date.

The data collected in connection with the order are processed in order to perform the contract concluded by placing an order (Article 6(1)(b) of the GDPR), to issue an invoice (Article 6(1)(c) of the GDPR) in connection with the regulations governing the issuance of

invoices), to include the invoice in the accounting documentation and to fulfil other tax and accounting obligations (Article 6(1)(c) of the GDPR in connection with the provisions governing tax and accounting obligations) and for the purposes of archival data for the purposes of any need to defend, establish or pursue claims, as well as to identify a returning customer, which is our legitimate interest (Article 6(1)(f) of the GDPR).

Order data will be processed for the time necessary to execute the order, and then until the expiry of the limitation period for claims under the concluded contract. In addition, after the expiry of this period, the data may still be processed by us for archival purposes for the purposes of any need to defend, establish or pursue claims, as well as to identify a returning customer. Please also note that we are required to keep accounting records, which may contain your personal data, for the period required by law.

### **Complaints and withdrawals from the contract – details**

If you file a complaint or withdraw from a contract, you provide personal data contained in the content of the complaint or statement of withdrawal from the contract, which includes your name and surname, address, telephone number, e-mail address, bank account number. Providing data is voluntary, but necessary to file a complaint or withdraw from the contract.

The data provided to us in connection with the submission of a complaint or withdrawal from the contract are used for the purpose of the complaint procedure or the withdrawal procedure, and then for archiving purposes, which is our legitimate interest (Article 6(1)(f) of the GDPR).

The data will be processed for the time necessary to carry out the complaint or withdrawal procedure. Complaint documents will be stored until the expiry of the warranty entitlements. Declarations of withdrawal from the agreement will be stored together with accounting documentation for the period required by law.

### **Newsletter details**

By subscribing to the newsletter, you provide us with your name and e-mail address. Providing data is voluntary, but necessary to subscribe to the newsletter.

In addition, our newsletter system records your IP address when subscribing to the newsletter, your approximate location, the email client you use to handle your email, and tracks your actions in connection with the messages sent to you. In this regard, we also have information about which messages you have opened, within which messages you have clicked on links, etc.

The data provided to us by you in connection with subscribing to the newsletter are used to send you the newsletter, and the legal basis for their processing is your consent (Article 6(1)(a) of the GDPR) given when subscribing to the newsletter. With regard to the processing of information that does not come from you but has been collected automatically by our mailing system, we rely on our legitimate interest (Article 6(1)(f) of the GDPR) to analyse the behaviour of newsletter subscribers in order to optimise our mailing activities.

You can unsubscribe from the newsletter at any time by clicking on the dedicated link in each newsletter message or simply by contacting us. Despite your unsubscribe from the newsletter, your data will still be stored in our database for the purpose of identifying the returning subscriber and possibly defending claims related to sending you the newsletter, in particular for the purpose of proving the fact that you have given your consent to receive the newsletter and the time of its withdrawal, which is our legitimate interest referred to in Article 6(1)(f) of the GDPR.

You can modify your newsletter data at any time by clicking on the appropriate link in each newsletter message or simply by contacting us.

### **Comments & Feedback Details**

When you add a comment or review, you must provide at least the username that will be associated with the comment or review (the name may contain personal information, such as your name) and your email address. Providing this data is voluntary, but necessary to add a comment or opinion. You can also add your avatar (it can include your image, e.g. a photo) and provide your website address, but it is not mandatory.

The data provided in connection with adding a comment or opinion will be processed for the purpose of publishing the comment or opinion on the website. The basis for the processing is your consent (Article 6(1)(a)) resulting from the submission of the form used to publish a comment or opinion. You can revoke your consent at any time by requesting that the comment or review be removed.

Your comment or review will be publicly available on the site for as long as it is available online, unless you request that the comment or review be removed in advance. You can also modify the content of the comment at any time, as well as modify the data assigned to it as the person who added the comment or opinion.

### **Correspondence handling – details**

By contacting us, you naturally provide us with your personal data contained in the content of the correspondence, in particular your e-mail address and name and surname. Providing data is voluntary, but necessary to make contact.

In this case, your data is processed for the purpose of contacting you, and the basis for the processing is Article 6(1)(f) of the GDPR, i.e. our legitimate interest. The legal basis for post-contact processing is also our legitimate purpose of archiving correspondence for the purpose of being able to prove certain facts in the future (Art. 6 (1) (f) GDPR).

The content of correspondence may be subject to archiving and we are not able to determine when it will be deleted. You have the right to request the history of the correspondence you have had with us (if it has been archived), as well as to demand its deletion, unless its archiving is justified by our overriding interests, e.g. to defend against potential claims on your part.

### **Tax and accounting obligations – details**

If we issue an invoice to you, it is part of the accounting documentation that will be stored for the period of time required by law. In such a situation, your personal data is processed in order to fulfil our tax and accounting obligations (Article 6(1)(c) of the GDPR in connection with the provisions governing tax and accounting obligations).

### **Archive – details**

As part of the description of the individual purposes of the processing of personal data, which can be found above, we have indicated the storage periods for personal data. These deadlines are often related to the archiving of certain data by us for the purpose of ensuring that we are able to prove certain facts in the future, reconstruct the course of cooperation with the client, exchanged correspondence, defence, establishment or assertion of legal claims. In this respect, we rely on our legitimate interest in Article 6(1)(f) of the GDPR.

### **Own marketing – details**

As part of our service, we use a mechanism for recovering abandoned carts. If you start the order process but don't complete it, our system will take note of this in order to take action to get you to complete your order. These actions may include, but are not limited to, sending you an email encouraging you to complete your order or displaying a targeted advertisement while you browse the Internet.

We carry out the activities described above on the basis of our legitimate interest referred to in Article 6(1)(f) of the GDPR, consisting in the marketing of our own products. You can object to this at any time.

## **#7: How long will we keep your personal data?**

The retention periods are indicated separately for each purpose of processing. You will find this information within the details dedicated to each separate purpose of processing.

We would like to draw your attention to the fact that we have adopted a model of storing your order data for the entire period of operation of our website. We assume that this works for your benefit, because you can recreate the history of your purchases at any time, and additionally take advantage of discounts, if we provide them for our regular customers. However, if you do not want your order data to be stored for so long, you can object to the storage of your order data for this purpose at any time. However, we would like to inform you that we have an overriding interest in storing your order data until the expiry of the limitation period for claims under the sales contract concluded with us.

## **#8: Who are the recipients of your personal data?**

We would venture to say that modern business is not able to do without services provided by third parties. We also use such services. Some of these services involve the processing of

your personal data. Third-party service providers who are involved in the processing of your personal data include:

- the hosting provider that stores the data on the server,
- provider of a cloud computing service in which backups are stored, which may contain your personal data,
- the provider of the mailing system in which your data is stored, if you are a newsletter subscriber,
- the provider of the invoicing system where your data is stored for the purpose of invoicing,
- an accounting office that processes your data visible on invoices,
- A maintenance service provider who accesses the data if the technical work is carried out in areas where the personal data is located;
- other subcontractors who have access to the data if the scope of their activities requires such access.

All the entities listed above process your data on the basis of personal data processing agreements concluded with us and guarantee an adequate level of personal data protection.

Your data is made available to courier companies to the extent necessary to deliver the order. These companies become independent controllers of your personal data.

If necessary, your data may be made available to an attorney-at-law or an attorney bound by professional secrecy. The need may arise from the need to seek legal aid that requires access to your personal data.

Your personal data may also be transferred to tax offices to the extent necessary to fulfil tax, settlement and accounting obligations. This includes, in particular, all declarations, reports, statements and other accounting documents that contain your personal data.

In addition, if necessary, your personal data may be made available to entities, bodies or institutions authorized to access data on the basis of legal provisions, such as police services, security services, courts, prosecutor's offices.

What is more, we use tools that collect a range of information about you related to the use of our website. In particular, the following information is involved:

- information about the operating system and web browser you are using,
- viewed by outsiders,
- Time spent on the site
- transitions between individual subpages,
- clicks on individual links,
- the source from which you come to our website,
- The age range you are in
- Your gender,
- Your approximate location is limited to the city.
- Your interests are determined by your online activity.



This information does not, in our opinion, in itself have the character of personal data. Since this information is collected by external tools that we use, this information is also processed by the providers of the tools on the terms and conditions resulting from their terms and conditions and privacy policies. Generally, we use this information to provide, manage, and improve our services, develop new services, measure the effectiveness of advertising, protect against fraud and abuse, and personalize the content and ads you see on each service, site, and app. We have tried to describe the details in this regard later in this policy, as part of the explanations dedicated to the individual tools.

### **#9: Do we transfer your data to third countries or international organizations?**

Yes, some of the processing of your personal data may involve the transfer of your personal data to third countries.

We transfer your personal data to third countries in connection with the use of tools that store personal data on servers located in third countries, in particular in the USA. The providers of these tools guarantee an adequate level of protection of personal data through appropriate compliance mechanisms provided for by the GDPR, in particular by joining the Privacy Shield program or using standard contractual clauses.

Personal data is stored on servers located in third countries using the following tools:

- Google services as part of the G-Suite package, provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland - in the scope of all data that is processed as part of Google services, including data contained in files subject to synchronization with Google Drive.

Google Ireland Limited ensures an adequate level of protection of personal data through the application of compliance mechanisms provided for by the GDPR, in particular through the use of standard contractual clauses.

We would also like to remind you that we use third-party tools that may collect anonymous information about you. We have already mentioned this several times in this policy, including in response to the previous question. The providers of these tools often use servers located around the world, in particular in the United States of America (USA), to store the information they collect.

### **#10: Do We Use Profiling? Do we make an automated decision based on your personal data?**

We do not make decisions about you based solely on automated processing, including profiling, which would produce legal effects concerning you or similarly significantly affect you.

Yes, we use tools that can take certain actions based on the information collected by the tracking mechanisms, but we believe that these actions do not have a material impact on you because they do not differentiate your situation as a customer, do not affect the terms of the contract you may enter into with us, etc.

By using certain tools, we can, for example, target you with personalized ads based on previous actions you have taken on our site or suggest products that may be of interest to you. We are talking about the so-called behavioural advertising. We encourage you to learn more about behavioural advertising, particularly in terms of privacy issues. Detailed information, including the ability to manage behavioral advertising settings, can be found here: <http://www.youronlinechoices.com>.

We would like to emphasize that as part of the tools we use, we do not have access to information that would allow us to identify you. The information we are talking about here is, in particular:

- information about the operating system and web browser you are using,
- viewed by outsiders,
- Time spent on the site
- transitions between individual subpages,
- the source from which you come to our website,
- The age range you are in
- Your gender,
- Your approximate location is limited to the city,
- Your interests are determined by your online activity.

We do not compare the information indicated above with your personal data that is stored in our databases. This information is anonymous and does not allow us to identify you. This information is stored on the servers of the providers of the respective tools, and these servers can usually be located all over the world.

## **#11: What rights do you have in relation to the processing of your personal data?**

The GDPR grants you the following potential rights related to the processing of your personal data:

- the right to access your data and receive a copy thereof,
- the right to rectify (correct) your data,
- the right to erasure (if in your opinion there are no grounds for us to process your data, you can request that we delete it),
- the right to restriction of data processing (you can request that we limit the processing of data only to their storage or performance of activities agreed with you, if in your opinion we have incorrect data or we process it unjustifiably),
- the right to object to the processing of your data (you have the right to object to the processing of your data on the basis of a legitimate interest; you should indicate a

specific situation which in your opinion justifies the cessation of the processing covered by the objection; we will stop processing your data for these purposes, unless we can demonstrate that the grounds for our processing of the data override your rights or, that your data is necessary for us to establish, pursue or defend claims),

- the right to data portability (you have the right to receive from us in a structured, commonly used and machine-readable format the personal data that you have provided to us on the basis of a contract or your consent; you can instruct us to transmit this data directly to another entity),
- the right to withdraw your consent to the processing of your personal data, if you have previously given such consent,
- the right to lodge a complaint with a supervisory authority (if you find that we process your data unlawfully, you may lodge a complaint in this matter with the President of the Personal Data Protection Office or another competent supervisory authority).

The rules related to the exercise of the above-mentioned rights are described in detail in Articles 16 – 21 of the GDPR. We encourage you to familiarize yourself with these regulations. For our part, we consider it necessary to clarify to you that the rights indicated above are not absolute and will not apply to all processing activities of your personal data.

We would like to emphasise that you always have one of the rights indicated above - if you believe that we have violated the provisions on personal data protection during the processing of your personal data, you have the right to lodge a complaint with the supervisory authority (the President of the Office for Personal Data Protection).

You can also always ask us to provide you with information about what data we hold about you and for what purposes we process it. All you have to do is send a message to [kontakt@chessstars.pl](mailto:kontakt@chessstars.pl). However, we have made every effort to ensure that the information you are interested in is comprehensively presented in this privacy policy. You can also use the e-mail address provided above if you have any questions related to the processing of your personal data.

## **#12: Do We Use Cookies and What Exactly Are They?**

Our website, like almost all other websites, uses cookies.

Cookies are small pieces of text information stored on your end device (e.g. computer, tablet, smartphone) that can be read by our ICT system (own cookies) or ICT systems of third parties (third-party cookies). Cookies may contain certain information that can be accessed by ICT systems for specific purposes.

Some of the cookies we use are deleted at the end of the browser session, i.e. when you close it (so-called session cookies). Other cookies are stored on your device and enable us to recognise your browser the next time you visit the website (persistent cookies).

If you want to learn more about cookies as such, you can read e.g. this material: [https://pl.wikipedia.org/wiki/HTTP\\_cookie](https://pl.wikipedia.org/wiki/HTTP_cookie).

### **#13: On what basis do we use cookies?**

We use cookies on the basis of your consent, except when cookies are necessary for the proper provision of electronic services to you.

Within the scope of your consent to cookies, we assume that you give such consent through the settings of your web browser or additional software supporting the management of cookies. We assume that you agree to all cookies used by us that are not blocked by your browser or additional software you use.

Remember that disabling or limiting the use of cookies may prevent you from using some of the functions available on our website and cause difficulties in using our website, as well as many other websites that use cookies. For example, if you block social media plugin cookies, the buttons, widgets and social media features implemented on our website may not be available to you.

### **#14: Can You Disable Cookies?**

Yes, you can manage your cookie settings within your web browser. You can choose to block all or some cookies. You can also block cookies from specific websites. You can also delete previously stored cookies and other website and plug-in data at any time.

Web browsers also offer the ability to use incognito mode. You can use it if you don't want information about the websites you've visited and the files you've downloaded to be saved in your browsing and download history. Cookies created in incognito mode are deleted when all incognito windows are closed.

Browser plug-ins are also available to control cookies, such as Ghostery (<https://www.ghostery.com>). The option to control cookies may also be provided by additional software, in particular anti-virus packages, etc.

In addition, there are tools available on the Internet that allow you to control certain types of cookies, in particular to collectively manage behavioral advertising settings (e.g. [www.youronlinechoices.com/](http://www.youronlinechoices.com/), [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)).

We also give you the ability to control cookies directly from our website. We have implemented a special cookie management mechanism that allows you to block cookies that you do not want.

Remember that disabling or limiting the use of cookies may prevent you from using some of the functions available on our website and cause difficulties in using our website, as well as many other websites that use cookies. For example, if you block social media plugin cookies, the buttons, widgets and social media features implemented on our website may not be available to you.

## **#15: For what purposes do we use first-party cookies?**

First-party cookies are used to ensure the proper functioning of individual mechanisms of the website, such as maintaining the session after logging in to the account, remembering recently viewed products and products added to the cart.

First-party cookies also store information about the cookie settings you have defined in the cookie management mechanism.

First-party cookies are also used to support the mechanism of recovering abandoned carts.

## **#16: What Third Party Cookies Are Used?**

The following third-party cookies are used on our website:

- Google Analytics,
- Google Tag Manager,
- Google AdWords,
- Google AdSense,
- Facebook Custom Audiences,
- Facebook, Twitter, Instagram, TikTok (social media cookies),
- YouTube.

Details of individual third-party cookies are described below.

### **Google Analytics - Details**

We use Google Analytics, which is provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We carry out activities in this area on the basis of our legitimate interest, which consists in the creation of statistics and their analysis in order to optimize our websites.

In order to use Google Analytics, we have implemented a special Google Analytics tracking code in the code of our website. The tracking code uses Google LLC cookies for Google Analytics. You can block the Google Analytics tracking code at any time by installing the browser add-on provided by Google: <https://tools.google.com/dlpage/gaoptout>.

Google Analytics automatically collects information about your use of our website. The information collected in this way is usually transmitted to Google's servers, which may be located and stored around the world.

Due to the IP anonymisation activated by us, your IP address is shortened before being forwarded. Only in exceptional cases will the full IP address be transmitted to a Google server and shortened there. As a rule, the anonymised IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

We would like to point out that Google Analytics does not collect any data that would allow you to be identified. Therefore, the data collected by Google Analytics is not personal data for us. The information we have access to as part of Google Analytics includes, in particular:

- information about the operating system and web browser you are using,
- subpages that you browse on our website,
- time spent on our website and its subpages,
- transitions between individual subpages,
- the source from which you come to our website.

In addition, we use the following Advertising Features as part of Google Analytics:

- demographic and interest reports,
- Remarketing
- advertising reporting features, user-ID.

We also do not collect personal data as part of the Advertising Features. The information we have access to includes, in particular:

- The age range you are in
- Your gender,
- Your approximate location is limited to the city,
- Your interests are determined by your online activity.

Google Analytics and Google Analytics 360 have been certified to the independent security standard ISO 27001. .ISO 27001 is one of the most widely recognized standards in the world and certifies that systems that support Google Analytics and Google Analytics 360 meet the relevant requirements.

If you're interested in more details about Google's use of data from sites and apps that use Google services, we encourage you to read the following information:

<https://policies.google.com/technologies/partner-sites>.

### **Google Tag Manager Details**

We use the Google Tag Manager tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA and allows us to manage tags, i.e. small pieces of code, thanks to which we are able to control traffic and user behavior, collect information about the effectiveness of advertisements, and take action to improve our Service. Google Tag Manager it does not collect any personally identifiable information about you, however, this tool triggers other tags, which in turn may collect data.

### **Google AdWords - details**

We use remarketing functions available within the Google AdWords system operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We carry out activities in this area based on our legitimate interest, consisting in the marketing of our own products or services.

When you visit our website, a Google remarketing cookie is automatically placed on your device, which collects information about your activity on our website. Thanks to the

information collected in this way, we are able to display ads to you within the Google network depending on your behavior on our website. For example, if you view a product, this will be recorded by the remarketing cookie, which will allow us to target you with an advertisement about that product or any other advertisement we deem appropriate. This advertisement will be displayed to you within the Google network when you use the Internet, browse other websites, etc.

We would like to emphasize that when using Google Ads, we do not collect any data that would allow us to identify you. Any compilation of the data in such a way that it becomes personal data may be carried out on the part of Google, but we are no longer responsible for this in this respect, as Google carries out these activities on the basis of a contract concluded with you as a user of Google services.

When using Google AdWords, we are only able to define the groups of recipients we would like our ads to reach. On this basis, Google decides when and how to show you our advertisement.

Further processing of information only takes place if you have consented to Google linking your browsing history to your account and using the information from your Google account to personalize the ads that are displayed on websites. In this case, Google will use your data to create and define target group lists for cross-device remarketing. To do this, Google combines the temporarily collected information with other data it has to create target groups.

If you don't want to receive personalized ads, you can manage your ad settings directly on Google's side: <https://adssettings.google.com/>.

If you're interested in more details about Google's use of data from sites and apps that use Google services, we encourage you to read the following information: <https://policies.google.com/technologies/partner-sites>.

### **Google AdSense Details**

We display ads on our pages as part of the Google AdSense network operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We carry out activities in this area based on our legitimate interest, consisting in the monetization of the content published by us.

Our website, in connection with the display of advertisements within the AdSense network, contains ad tags that instruct your web browser to send a request for advertising content from Google's servers. Along with the advertising content, the server also sends a cookie. Cookies are used to serve ads based on your previous visits to our website or other websites. AdSense also uses cookies to improve the quality of its ads. Common uses include, m.in, targeting ads based on topics you're interested in, improving your campaign performance reports, and skipping ads you've already seen.

We would like to emphasize that when using Google AdSense, we do not collect any data that would allow us to identify you. Any compilation of the data in such a way that it becomes personal data may be carried out on the part of Google, but we are no longer

responsible for this in this respect, as Google carries out these activities on the basis of a contract concluded with you as a user of Google services.

Further processing of information only takes place if you have consented to Google linking your browsing history to your account and using the information from your Google account to personalize the ads that are displayed on websites. In this case, Google will use your data to create and define target group lists for cross-device remarketing. To do this, Google combines the temporarily collected information with other data it has to create target groups.

If you don't want to receive personalized ads, you can manage your ad settings directly on Google's side: <https://adssettings.google.com/>.

If you're interested in more details about Google's use of data from sites and apps that use Google services, we encourage you to read the following information: <https://policies.google.com/technologies/partner-sites>.

### **Facebook Custom Audiences – details**

As part of the Facebook Ads advertising system provided by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA, we use the Custom Audience function to target targeted advertising messages to specific groups of users. We carry out activities in this area based on our legitimate interest, consisting in the marketing of our own products or services.

In order to target you with ads personalized to your behavior on our website, we have implemented the Facebook Pixel as part of our website, which automatically collects information about your use of our website. The information collected in this way is most often transmitted to Facebook's servers, which may be located around the world, in particular in the United States of America (USA).

The information collected as part of the Facebook Pixel is anonymous, i.e. it does not allow us to identify you. Depending on your activity on our sites, you may reach a specific audience, but we do not identify individuals in any way who belong to those audiences.

However, we would like to inform you that Facebook may combine the information it collects with other information about you collected as part of your use of Facebook and use it for its own purposes, including marketing. These Facebook activities are no longer dependent on us, and you can look for information about them directly in Facebook's privacy policy: <https://www.facebook.com/privacy/explanation>. You can also manage your privacy settings from your Facebook account. Here you will find useful information in this regard: <https://www.facebook.com/ads/settings>.

### **Social Tools Details**

Our website uses plug-ins, buttons and other social media tools, hereinafter collectively referred to as "plugins", provided by social networks such as Facebook, Instagram, Twitter, TikTok, YouTube.

When you visit our website that contains a plug-in for a social network, your browser sends



information about your visit to the operator of the social network. Since the plug-in is a part of the social network embedded in our website, your browser sends information about the request to download the content of the respective social network to our website.

Plug-ins collect certain information about you, such as your user ID, the website you visited, the date and time, and other information about your web browser.

The operators of the social networks use some of this information to personalize your viewing experience on our website. For example, when you visit a page with a "Like" button, the administrator of the social network needs information about who you are in order to show you which of your friends also like our page.

The information collected by the plug-ins may also be used by the administrators of social networks for their own purposes, such as e.g. improving their own products, creating user profiles, analyzing and optimizing their own activities, targeting ads. We have no real influence on how the information collected by the plug-ins is subsequently used by the operators of the social networks. Details in this regard can be found in the terms and conditions and privacy policies of individual social networks.

The plug-ins of the social networks collect and transmit information to the operators of these services even if you are browsing our website without being logged in to your social network account. But then the browser sends a more limited set of information.

If you have logged in to one of the social networks, the website administrator will be able to directly assign your visit to our website to your profile on the respective social network.

If you do not want the social networks to assign the data collected during your visit to our website directly to your profile on the respective website, you must log out of this service before visiting our website. You can also prevent plugins from being loaded on your website altogether by using appropriate extensions for your browser, e.g. script blocker.

In addition, the use of certain plug-ins may involve the publication of certain information within your social media profiles. For example, clicks on the "Like" button may be available on your Facebook timeline. Of course, if you share any content on your social media using plugins embedded on our website, this sharing will naturally be visible in your profile.

When it comes to the details related to the processing of information collected by the plug-ins by the administrators of social networks, in particular the purpose and scope of data collection and their further processing and use by the administrators, as well as the possibility of contact and your rights in this regard and the possibility of making settings to ensure the protection of your privacy, you can find everything in the privacy policies of the respective service providers:

- Facebook - <https://www.facebook.com/privacy/explanation>
- Twitter - <https://twitter.com/en/privacy>,
- Instagram - <https://www.facebook.com/help/instagram/155833707900388>,
- YouTube - <https://www.youtube.com/howyoutubeworks/user-settings/privacy/>
- TikTok - <https://www.tiktok.com/legal/privacy-policy-eea?lang=pl>,

## **YouTube Details**

YouTube widgets are embedded on our pages so that you can play YouTube videos directly from our pages. YouTube is operated by Google LLC.

Videos are embedded on the site in privacy mode. Based on the information provided by YouTube, this means that no cookies are stored on your device and Google does not collect any information about you until you play the recording.

When you play a recording, YouTube stores cookies on your device and receives the information that you have played the recording from a specific website, even if you do not have a Google Account or are not currently logged in. If you are logged in to your Google account, the service provider will be able to directly assign your visit to our website to your account. The purpose and scope of the data collection and its further processing and use by Google, as well as the possibility of contact, your rights in this regard and the possibility of setting settings to ensure the protection of your privacy are described in Google's privacy policy.

If you do not want Google to assign the data collected during video playback directly to your profile, you must log out of your account before playing the video. You can also prevent plugins from being loaded on your website altogether by using appropriate extensions for your browser, e.g. script blocker.

The information collected as part of the cookies related to the YouTube videos embedded on our pages is used by Google to ensure the proper and secure functioning of the widget, to analyze and optimize the services provided by YouTube, as well as for personalization and advertising purposes.

Please note that when you play recordings available on YouTube, you are using services provided electronically by Google LLC. Google LLC is an independent, independent entity providing electronic services to you. You can look for details on YouTube's policies, including privacy protection, in the documents provided directly by YouTube:

- Terms and Conditions: <https://www.youtube.com/t/terms>,
- Privacy Policy: <https://policies.google.com/privacy>

## **#17: Do we track your behavior on our site?**

Yes, we use Google Analytics and Google AdWords tools, which collect information about your activities on our website. These tools are described in detail as part of the question on third-party cookies, so we will not repeat this information here either.

In addition, almost every link referring from our services to the chess.com website contains our affiliate number, so that after you purchase a package on the chess.com website, the website administration will chess.com be able to link your account with us and pay us a commission.

## **#18: Are We Targeting You?**

Yes, we use Facebook Ads and Google Ads, where we can target ads to specific target groups defined on the basis of various criteria such as age, gender, interests, profession, work, and previous activities undertaken on our website. These tools are described in detail as part of the question on third-party cookies, so we will not repeat this information here either.

## **§ 19: How can you manage your privacy?**

The answer to this question can be found in many places in this privacy policy when describing individual tools, behavioral advertising, consent to cookies, etc. Nevertheless, for your convenience, we have once again collected this information in one place. Below you will find a list of options for managing your privacy.

- cookie settings within the web browser,
- browser plug-ins supporting the management of cookies, e.g. Ghostery,
- additional software managing cookies,
- Incognito mode in a web browser
- behavioural advertising settings, e.g. youronlinechoices.com,
- the mechanism of managing cookies from the level of our website,
- Google Analytics Opt-out: <https://tools.google.com/dlpage/gaoptout>,
- Google Ads Settings: <https://adssettings.google.com/>,
- Facebook Ads Settings: <https://www.facebook.com/ads/settings>,

## **#20: What Are Server Logs?**

The use of the website involves sending queries to the server on which the website is stored. Each request to the server is recorded in the server logs.

Logs include, m.in, your IP address, server date and time, information about your web browser and the operating system you are using. Logs are saved and stored on the server.

The data stored in the server logs are not associated with specific persons using the website and are not used by us to identify you.

Server logs are only auxiliary material used to administer the website, and their content is not disclosed to anyone other than persons authorized to administer the server.

## **#21: Is There Anything Else You Should Know?**

As you can see, the subject of personal data processing, the use of cookies and the management of privacy in general is quite complicated. We have made every effort to ensure that this document provides you with as much knowledge as possible on issues that are important to you. If anything is unclear to you, want to know more, or just talk about your privacy, please email us at [kontakt@chessstars.pl](mailto:kontakt@chessstars.pl)

## **#22: Can This Privacy Policy Be Subject to Change?**

Yes, we may modify this privacy policy, in particular due to technological changes on the part of our website and changes in the law. If you are a registered user of the website, you will receive a notification about any changes to the privacy policy. In addition, all archived versions of the privacy policy are linked below.