

Privacy policy

DEFINITIONS

1. **Controller** means a natural or legal person, public authority, unit or other entity which, alone or jointly with others, determines the purposes and methods of personal data processing – WSR Comfort sp. z o.o. with its registered office at 43 Głazowa Street (60-116) in Poznań, entered into the register of entrepreneurs kept by the Sąd Rejonowy w Poznaniu, XXI Wydział Gospodarczy Krajowego Rejestru Sądowego pod numerem KRS 0000871826, REGON:639693310, NIP: 7781369984 belonging to companies from the Dalpo group with its registered office in Poznań, 3 Miedziana Street, 60-118 Poznań (hereinafter: "Dalpo").
2. **Personal data** – information about a natural person identified or identifiable by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity, including image, voice recording, contact details, location data, information contained in correspondence, information collected through recording equipment or other similar technology.
3. **Data subject** – a natural person to whom the personal data processed by the Controller relates, e.g. a person sending an inquiry to him in the form of an e-mail.
4. **Policy** – this Privacy Policy
5. **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.
6. **Website** – a website run by the Controller at <https://comfort-reha.pl/en/>.
7. **User** – any natural person visiting the Website or using one or more of the services or functionalities described in the Policy.

DATA PROCESSING BY THE CONTROLLER

1. In connection with its business activity, the Controller collects and processes personal data in accordance with the relevant regulations, including in particular the GDPR and the principles of data processing provided therein.
2. Controller:
 - ensures transparency of data processing;
 - always informs about the processing of data at the time of their collection, in particular about the purpose and legal basis for the processing of personal data, unless it is not obliged to do provided for under separate regulations;
 - ensures that data is collected only to the extent necessary for the indicated purpose and is processed only for the period for which it is necessary;
 - when processing data, the Controller ensures their security and confidentiality as well as access to information about the processing to Data Subjects. If, despite the security measures in place, a personal data breach occurs (e.g. data "leakage" or loss) and such a breach could result in a high risk of violation of the rights and freedoms of Data Subjects, the Controller will inform the Data Subjects of such an event in a manner consistent with the regulations.

CONTACT WITH THE CONTROLLER AND THE DATA PROTECTION OFFICER

1. Contact with the Administrator is possible via e-mail address: biuro@comfort-reha.pl or correspondence address: WSR Comfort sp. z o.o. 43 Głazowa Street, 60-116, Poznań.
2. The Controller has appointed Ms. Natalia Dzieciuchowicz as the Data Protection Officer, who can be contacted in all matters related to data protection by sending a message to iod@dalpo.pl email address or in writing to the postal address of the Administrator indicated above.

SECURITY OF PERSONAL DATA

1. In order to ensure the integrity and confidentiality of data, the Controller has implemented procedures enabling access to personal data only to authorised persons and only to the extent that it is necessary due to the tasks performed by them. The Controller uses organisational and technical solutions to ensure that all operations on Personal Data are registered and performed only by authorised persons.
2. The Controller undertakes all necessary actions to ensure that its subcontractors and other cooperating entities guarantee the application of appropriate security measures in each case when they process Personal Data on behalf of the Controller.
3. The administrator conducts an ongoing risk analysis and monitors the adequacy of the data security measures used to the identified threats. If necessary, the Controller implements additional measures to increase data security.

PURPOSES AND LEGAL BASES OF PROCESSING

1. WEBSITE

In connection with the use of the Website by the User, the Controller collects data to the extent necessary to provide customized services, as well as information about the User's activity on the Website. Personal data of all persons using the Website (including IP addresses, other identifiers, and information collected through cookies) are processed by the Controller:

- **for the proper functioning of the Website** – essential files: processed on the basis of the Controller's legitimate interest (Article 6(1)(f) of the GDPR);
- **to analyze website traffic, understand User preferences, study behavior on the Website, and enable interaction with external networks and platforms** – statistical files: processed on the basis of the User's voluntary consent (Article 6(1)(a) of the GDPR);
- **to display advertisements tailored to the profile of the User visiting the Website** – profiles are created based on browsing history and shared with advertising partners to display personalized ads on other websites – marketing files: processed on the basis of the User's voluntary consent (Article 6(1)(a) of the GDPR).

2. CONTACT FORM PARTNER STORES

The Controller provides the possibility to receive lists of partner stores via the electronic contact form. Using the form requires providing personal data necessary to verify the quality of contact service and respond to the inquiry.

Providing data marked as mandatory is required to receive a list of partner stores, and failure to provide such data will result in the inability to obtain the list. Providing other data is voluntary.

Personal data is processed for the purpose of identifying the sender and handling their inquiry submitted through the provided form – the legal basis for processing such data is

the legitimate interest of the Controller (Article 6(1)(f) of the GDPR). In the case of optional data, processing is based on the User's consent (Article 6(1)(a) of the GDPR).

3. CONTACT FORM

The Controller provides the possibility to contact them via the electronic contact form. Using the form requires the provision of personal data necessary to establish contact and respond to the inquiry.

Providing data marked as mandatory is required to receive and handle the inquiry, and failure to provide such data will result in the inability to process it. Providing other data is voluntary.

Personal data is processed for the purpose of identifying the sender and handling their inquiry submitted via the provided form – the legal basis for processing such data is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR). In the case of optional data, processing is based on the User's consent (Article 6(1)(a) of the GDPR).

4. PURCHASE OF PRODUCTS (including purchases by phone and/or email)

The Controller provides the possibility of purchasing products via telephone and/or e-mail. For this purpose, the following personal data is collected: name and surname, PESEL number, date of birth, correspondence/shipping address, e-mail address, and telephone number, which are processed for the purpose of:

- **taking actions at the request of the buyer aimed at concluding the contract and performing the concluded purchase and sale agreement**, including handling payments, delivery and status updates, and managing the complaint process (pursuant to Article 6(1)(b) of the GDPR);
- **fulfilling legal obligations incumbent on the Controller**, particularly those related to financial settlements with the National Health Fund (NFZ), accounting, taxation, and archival purposes (Article 6(1)(c) of the GDPR);
- **in cases where the purchase is made by the patient's legal guardian**, collecting the following data for NFZ settlement purposes: name and surname, PESEL number, and date of birth of both the patient and the legal guardian;
- **pursuing or securing claims**, which constitutes the legitimate interest of the Controller (Article 6(1)(f) of the GDPR).

5. REGISTRATION OF A REHABILITATION STROLLER

The Controller provides the possibility of registering purchased rehabilitation equipment (stroller) via the Website. Registering the stroller and agreeing to receive marketing information grants an extended warranty for the stroller frame (the full text of the warranty conditions can be found under the registration form).

The option to obtain an extended warranty is an additional benefit to the concluded purchase and sale agreement and is conditional upon consent to the processing of personal data for marketing purposes.

You may withdraw your consent at any time. However, if you choose not to provide consent, you will not be eligible for the extended warranty. Withdrawal of consent will not affect the quality of services provided or your access to the standard contract terms (including quality and price).

6. TELEPHONE CONTACT

When the Controller is contacted by phone regarding matters not related to a concluded contract or the services provided, the Controller may request the provision of personal data only if it is necessary to handle the inquiry. The legal basis for such processing is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR), which consists of the necessity to address the reported matter in connection with the Controller's business activities.

7. E-MAIL AND TRADITIONAL MAIL

In the case of sending correspondence to the Controller via e-mail or traditional mail that is not related to the services provided to the sender or any other contract concluded with them, the personal data contained in this correspondence is processed solely for the purpose of communication and resolving the matter to which the correspondence relates.

- **The legal basis for processing** is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR), which consists of handling correspondence addressed to them in connection with their business activities;
- The Controller processes only personal data relevant to the matter to which the correspondence relates.

8. CUSTOMER SATISFACTION SURVEY

When a customer satisfaction survey is conducted by sending a paper questionnaire to the customer, the personal data provided in the survey is processed based on the legitimate interest of the Controller (Article 6(1)(f) of the GDPR), which consists of improving the products and services offered.

9. NEWSLETTER

The subscription to the Newsletter by the Website User requires the provision of personal data. Providing data marked as mandatory is necessary to process the subscription request, and failure to provide such data will result in the request not being processed.

Personal data is processed for the purpose of sending marketing content as part of the Newsletter – the legal basis for processing is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR) in connection with the User's consent to receive the Newsletter.

To receive the Newsletter, the User must have access to the Internet and an e-mail address. No specific technical requirements are necessary beyond having a commonly used operating system and a web browser.

The User may unsubscribe from the Newsletter at any time by sending an e-mail to the following address: **biuro@comfort-reha.pl**.

10. SOCIAL MEDIA

The Controller operates social media profiles (including on Facebook and Instagram) and therefore processes data left by visitors to these profiles (e.g., comments, likes, online identifiers). The personal data of these individuals are processed:

- **to enable user interaction on the profiles;**
- **to effectively manage the profiles** by providing users with information about the Controller's services, products, and events;
- **for statistical and analytical purposes;**
- **if necessary, to pursue claims and defend against claims.**

The legal basis for processing personal data is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR), which consists of:

- **promoting the brand and improving the quality of services provided;**
- **if necessary, pursuing claims and defending against claims.**

Facebook and Instagram are operated by Meta Platforms, Inc., California, USA, and Meta Platforms Ireland Ltd.

Due to the fact that the services provided by Facebook and Instagram have a global reach, in connection with their implementation, personal data may be transferred to countries outside the European Economic Area on the basis of the data transfer rules set out by the portals, available respectively at:

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

Instagram –<https://privacycenter.instagram.com/policy>

Notice of joint controllership with Meta Platforms (Facebook and Instagram)

As part of the operation of our profile on the social media platforms Facebook and Instagram, which are owned by Meta Platforms Ireland Ltd. (address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland), we act as a **joint controller** of your personal data concerning the processing of data related to interactions with our profiles. **Responsibilities**

Meta Platforms is responsible for:

- sharing the technical infrastructure of the Facebook and Instagram platforms.
- collecting and processing data within its tools (e.g. cookies, tracking technologies).
- ensuring compliance with the GDPR in the scope of basic functionalities of platforms.

WSR Comfort sp. z o.o. is responsible for:

- content published on profiles and interactions with users.
- Use of data provided by Meta Platforms, for analytics or marketing purposes.

To exercise their rights related to the processing of data by Meta Platforms, users can contact Meta directly through their platforms or submit their request to us, and we will forward it to Meta.

If a Platform User contacts **WSR Comfort sp. z o.o.** for purposes related to the conclusion of a contract (e.g., a request for an offer), **WSR Comfort sp. z o.o.** processes the data on the basis of **Article 6(1)(b) of the GDPR** (actions taken to conclude or perform a contract).

Such processing may involve the transfer of data to entities cooperating with **WSR Comfort sp. z o.o.** (distributors) located outside the **EEA**. The transfer is carried out in accordance with the principles set out in **Chapter V of the GDPR**.

11. MARKETING

The Controller will process personal data to send marketing content via the communication channel to which the User has voluntarily consented, i.e., by e-mail to the provided e-mail address and/or via telephone call, in order to present commercial offers and deliver personalized information about products and services – based on the legitimate interest of the Controller (Article 6(1)(f) of the GDPR).

12. COMMUNICATION WITH THE USER VIA ON-LINE CHAT

The Controller provides the User with the possibility of contact through the **CHAT ONLINE** application available on the website – based on the legitimate interest of the Controller, which consists of building and developing relationships with customers (Article 6(1)(f) of the GDPR)

PERIOD OF PERSONAL DATA PROCESSING

1. The period of data processing by the Controller depends on the type of service provided and the purpose of processing. As a general rule, data is processed for the duration of service provision or order execution.
 - **For contractual purposes:** Personal data collected for the performance of a purchase and sale agreement will be processed for **10 years**, counted from the end of the calendar year in which the purchase was made.
 - **For consent-based processing:** Data is processed until consent is withdrawn or an effective objection is raised, in cases where the legal basis for processing is the Controller's legitimate interest.
 - Data collected for **sending marketing content** will be processed until the User withdraws consent for the selected communication channel or raises an objection to processing.
 - Data obtained through **communication with the User via the Chat Online application and other tools** will be processed until an objection to processing is raised.

- Data collected from **customer satisfaction surveys** will be processed until the purpose for which they were collected ceases to exist or until an objection to processing is raised.

– **For cookies and tracking technologies:** Data obtained through cookies will be processed in accordance with the provisions outlined in the **Cookies Policy** below.

2. The period of data processing may be extended if the processing is necessary to establish and pursue possible claims or defence against claims, and after this time only in the case and to the extent required by law. After the expiry of the processing period, the data is irreversibly deleted or anonymized.

DATA RECIPIENTS

1. In connection with the provision of services, personal data will be disclosed to external entities, including, in particular, suppliers responsible for the operation of IT systems, entities providing accounting services, and entities related to the Controller, including companies within its capital group. In justified cases, and based on an appropriate legal basis, data may also be made available to authorities or third parties that submit a request for such information (e.g., the **National Health Fund, Social Welfare Centres, Foundations, and Associations**) for the purposes of accounting for the purchase of rehabilitation equipment or assisting in obtaining funding.
2. As a rule, the Controller does not transfer data outside the **European Economic Area (EEA)**. However, if such a transfer becomes necessary, it is carried out in accordance with the principles set out in **Chapter V of the GDPR**. The Controller always informs about the intention to transfer personal data outside the EEA at the stage of their collection.

RIGHTS OF DATA SUBJECTS

1. Each User whose personal data is processed by the Controller has the right to:
 - **access** the content of their personal data;
 - **rectify** their data;
 - **delete** their data;
 - **limit** data processing;
 - **transfer** their data;
 - **object** to processing carried out on the basis of the Controller's legitimate interest;
 - **withdraw consent at any time**, without affecting the lawfulness of processing carried out based on that consent before its withdrawal.
2. The Website User also has the right to lodge a complaint with the **President of the Office for Personal Data Protection** if they believe that the processing violates the provisions of the **General Data Protection Regulation (GDPR)**.

COOKIE POLICY

1. WHAT ARE COOKIES

Cookies are small text files that are stored on the User's computer or mobile device (e.g. phone, tablet) when they visit the www.comfort-reha.eu website. These files store various information about the User and their preferences.

A cookie typically contains the name of the website from which it originated, the lifetime of the cookie, and a value, usually a randomly generated and unique string of characters.

2. PURPOSE OF THE COOKIE POLICY

This cookie policy contains information about the cookies used and regulates the rules of their use on the www.comfort-reha.pl website.

3. SETTING AND MANAGING COOKIES

The settings of commonly used web browsers allow all types of cookies to be saved. However, you can manage file settings through:

- **Tools provided by web browser operators** (details available by clicking on the links below):
 - Internet Explorer
 - Mozilla Firefox
 - Google Chrome
 - Opera
 - Safari
- **The file management panel displayed when the main page of the website is loaded**
 - Selecting the **"I agree"** option allows the Website to save and use all files on your device.
 - By clicking **"Manage tracking settings"**, you can choose to allow only selected types of files, which are described in more detail in point 4 below.

The User has the right to withdraw consent to the use of cookies by the Website at any time. This can be done, for example, by using the **"Cookies management"** button.

Please note that **disabling cookies or not accepting the settings may result in difficulties in using certain functionalities** of the www.comfort-reha.eu website.

TYPES OF COOKIES

The cookies collected by the Website can be divided according to:

1. **The time for which cookies are installed in the User's browser:**
 - a) **"Session" cookies** – temporary files that are stored on the User's end device until logging out, leaving the website, turning off the software (web browser), or manually deleting them.
 - b) **"Persistent" cookies** – files stored on the User's end device for the time specified in the cookie parameters or until they are deleted by the User.
2. **The purpose of using cookies:**
 - a) **Necessary** – required for the proper functioning of the Website, processed on the basis of the legitimate interest of the Controller (Article 6(1)(f) of the GDPR).

b) **Preferential** – allow the Website to "remember" User-selected settings and personalize the interface, such as language preferences, region, font size, and website appearance, processed on the basis of the User's voluntary consent (Article 6(1)(a) of the GDPR).

c) **Statistical** – enable the analysis of website traffic, User preferences, and behavior, as well as interaction with external networks and platforms, processed on the basis of the User's voluntary consent (Article 6(1)(a) of the GDPR).

d) **Marketing** – used to tailor displayed advertisements and content to User preferences and conduct personalized marketing campaigns, processed on the basis of the User's voluntary consent (Article 6(1)(a) of the GDPR).

This website uses cookies. We use cookies to personalize content and ads, to offer social features, and to analyze our site traffic. We share information about how you use our website with social, advertising, and analytics partners. Partners may combine this information with other data they receive from you or from your use of their services.

Cookies are small text files that can be used by websites to make the user experience more efficient.

The law states that we may store cookies on your device if this is necessary for the operation of this website. For all other types of cookies, we need your permission.

This website uses different types of cookies. Some cookies are placed by third-party services that appear on our sites.

You can withdraw your consent at any time in the Cookie Declaration on our website.

Learn more about who we are, how you can contact us and how we process personal data under [the Privacy Policy](#).

Please provide your consent ID and the date you contacted us about your consent

Your consent applies to the following domains: comfort-reha.pl

Your current state: Allow all.

Your consent ID:

jIQJds2QvVKttl+97I143tAespGJLmfvnb/WGZSrpEA3KvE7d2oIDg== Consent date: Friday, October 4, 2024 13:31:07 CEST

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