PRIVACY AND COOKIE POLICY

Nadaje Broadcasting Sp. z o.o. | Version dated 27 October 2026

This document describes how Nadaje Broadcasting Sp. z o.o. processes personal data in connection with Nadaje.com websites and the services provided, including the use of Odoo, electronic communications and technologies necessary for the operation of the website.

1. DATA CONTROLLER AND CONTACT

The controller of personal data relating to customer accounts, sales, contract administration and business contacts is Nadaje Broadcasting Spółka z ograniczoną odpowiedzialnością, ul. Świdnicka 12-16, 50-068 Wrocław, Poland, KRS 0000752054, NIP 8971860488 (hereinafter "Nadaje.com"). For privacy enquiries, contact broadcasting@nadaje.com.

For data of persons appearing in customers' audiovisual materials, or data entrusted in connection with specific services, Nadaje.com may act as a processor on behalf of the customer. The scope and roles are determined by the relevant contract and data processing agreement.

2. OUR PRINCIPLES

We apply the principle of data minimisation ("privacy by default"). We do not sell personal data or use advertising profiling or external analytics and marketing tools on our websites, unless the current configuration verified before publication indicates otherwise. We do not collect consent for marketing emails when no such communications are sent. The absence of marketing tracking does not mean that we do not process data required to maintain accounts, provide services and ensure security.

3. DATA CATEGORIES AND PURPOSES OF PROCESSING

Purpose | Data categories | Legal basis

Account and performance of contract | Identification and contact details, account information, orders, service settings | Art. 6(1)(b) GDPR

Billing and documentation | Billing information, transaction and document data | Art. 6(1)(c) GDPR and, where applicable, point (b)

Handling enquiries | Email address, correspondence and information provided by the sender | Art. 6(1)(b) or (f) GDPR, depending on the matter

Security and abuse prevention | Technical session and connection data, and in certain circumstances IP address | Art. 6(1)(f) GDPR; assessment of proportionality and retention

Service notifications | Contact address and information relating to the service | Art. 6(1)(b) or (c) GDPR, depending on the notification

Providing data required to conclude a contract or comply with a legal obligation is a condition of the relevant service. Providing other data may be voluntary; details depend on the form or activity concerned. The controller's legitimate interests include ensuring website security, preventing abuse and handling correspondence not directly related to performing a contract.

4. TECHNICAL CONNECTION INFORMATION AND SECURITY

The contact-form protection mechanism nadaje.contact.guard temporarily stores an IP address to prevent abuse and deletes it after the applicable limit. The nadaje.payu.checkout.gate mechanism uses the IP address to limit payment attempts; the data is deleted after one day.

An IP address and its hash may constitute personal data where, in the circumstances, they can be linked to an individual. We do not regard hashing alone as a guarantee of anonymisation.

5. COMMUNICATIONS NECESSARY TO PROVIDE SERVICES

We send messages concerning orders, security, outages, scheduled maintenance, changes to important panel features, login rules and changes to the terms of service. Such messages are not used to present marketing offers. We do not require separate marketing consent for information necessary to perform a contract.

The Brevo service may be used to handle email. If we introduce electronic marketing in the future, it will be addressed separately.

6. STREAMING, PLAYER AND STATISTICS

We provide solutions for streaming and playing audio/video materials, including players embedded in customers' websites. The customer may be the controller of data relating to individuals appearing in the materials and may be responsible for establishing the legal basis for their publication. Nadaje Broadcasting may process these materials on the customer's documented instructions.

We assume there is no advertising tracking of viewers and use our own aggregated statistics (e.g. number of plays, transfer volume and load). CDN77.com, established in the United Kingdom and processing data in Prague, within the EEA, is a subcontractor for content delivery in streaming services.

7. COOKIES AND SIMILAR TECHNOLOGIES

The client.nadaje.com website uses session and language preference mechanisms. The following have been identified: session_id (session, HttpOnly, approximately 7 days), frontend_lang (language preference, approximately one year), nadaje_lang_inferred (inferred language, approximately one year), and code supporting nadaje_lang_explicit (explicit language selection).

Technologies required to transmit communications or strictly necessary to provide a service requested by the user may qualify for a statutory exemption from consent. At client.nadaje.com we use only cookies and similar technologies necessary to maintain sessions and operate functions and preferences requested by users.

We do not use cookies for behavioural advertising or cross-site tracking. The website uses only technologies covered by the statutory exemption, so we do not display a banner for collecting cookie consent. Users can manage cookies in their browser settings; blocking them may limit certain functions.

8. DATA RECIPIENTS AND SERVICE PROVIDERS

Data may be disclosed to providers of hosting, content delivery networks, email and communications services, technical support and payment processing, solely to the extent necessary for the relevant purposes. Depending on the service used, recipients may include Hetzner, DataPacket, CDN77, Brevo, Proton Mail and PayU. Not all these entities receive personal data in every case. Nadaje limits disclosure of personal data outside its own systems as much as possible and, where technically required, uses encryption compliant with modern networking standards.

PayU payment operator

To process electronic payments, personal data necessary to handle a transaction may be transferred to PayU S.A., ul. Grunwaldzka 186, 60-166 Poznań, Poland.

PayU S.A. acts as an independent controller of personal data processed in connection with payment transactions, their security, complaints handling and compliance with statutory obligations.

Detailed information on PayU's processing of personal data is available in the operator's privacy policy.

9. PROCESSING AND DISTRIBUTION OUTSIDE THE EEA

Nadaje uses European infrastructure, although live streams may be distributed globally through CDN77.com points of presence (PoPs), unless restricted territorially by a written agreement between the customer and Nadaje. Technical connection data relating to viewers may reach infrastructure elements serving their region under the CDN's no-log policy. As at the publication date of this policy, we do not transfer personal data outside the European Economic Area in the operations described. Global distribution of audiovisual content does not in itself constitute a transfer of personal data under the GDPR. If the processing model changes, any transfers outside the EEA will be based on an appropriate legal basis and safeguards, taking into account the roles of Nadaje, the customer and service providers. Personal data contained in invoices is processed in KSeF and Comarch ERP Optima, including through the Comarch OCR service.

10. RETENTION PERIODS

We retain account and contract data for the duration of the service and subsequently for the period required by law or necessary to establish, exercise or defend legal claims. Accounting documents are retained in accordance with applicable regulations in KSeF and Comarch. Security data is retained for as short a period as possible, in accordance with established limits. Retention periods depend on the type and purpose of data processing, particularly statutory accounting and tax periods and limitation periods for claims.

11. RIGHTS OF DATA SUBJECTS

Subject to the conditions of the GDPR, individuals have the rights of access, rectification, erasure, restriction of processing, data portability, objection to processing based on legitimate interests and withdrawal of consent where consent is the legal basis. A complaint may also be lodged with the President of the Polish Personal Data Protection Office. Requests should be sent to the contact address given in section 1.

12. CHANGES TO THIS DOCUMENT

We update this policy when services, laws or methods of data processing change. The current version is available on the legal information page of Client.nadaje.com. Important information concerning existing contracts is communicated in accordance with the terms of service and applicable law.